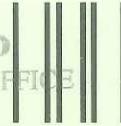


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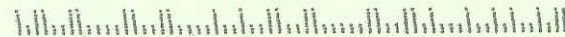


MAR 02 2010

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DIANE SHARROW
U.S. Environmental Protection Agency
Land and Chemicals Division
RCRA Compliance Section 1 (LR-85)
77 W Jackson Blvd
Chicago, Illinois 60604



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1. Article Addressed to:

Madhukar S. Kalaria
President
Eagle Electronic, Incorporated
717 North Terrance
Mount Prospect, Illinois 60056

2. Article Number

(Transfer from service)

7001 0320 0005 8915 4896

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X Bharna Kalaria

☐ Agent☐ Addressee

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

file

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Madhukar S. Patel
Registered Agent
Eagle Electronics, Incorporated
1735 Mitchell Boulevard
Schaumburg, Illinois 60193

Madhukar S. Kalaria
President
Eagle Electronics, Incorporated
717 Noah Terrace
Mount Prospect, Illinois 60056

Re: Notice of Intent to File Civil Administrative Complaint Against Eagle Electronics,
Incorporated
EPA ID No.: ILD 981 088 800

Dear Messrs. Patel and Kalaria:

The U.S. Environmental Protection Agency plans to file an administrative complaint for civil penalties against Eagle Electronics, Incorporated (Eagle Electronics or you). We will allege that you violated the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 - 6992k, as amended. Specifically, based upon the inspection EPA conducted of your facility on December 2, 2007, and information Eagle Electronics has submitted in response to a February 11, 2008, Notice of Violation and subsequent Information Request, we will allege the following violations:

1. Failure to mark two hazardous waste accumulation containers with the words, "Hazardous Waste," in violation of 35 IAC §§ 722.134(a)(3) and (c)(1)(B) [40 C.F.R. §§ 262.34(a)(3) and (c)(1)(B)].
2. Failure to mark and make visible the accumulation start date on a hazardous waste accumulation container in violation of 35 IAC § 722.134(a)(2) [40 C.F.R. § 262.34(a)(2)].

3. Failure to close two accumulation containers holding hazardous waste when hazardous waste was neither being added or removed, in violation of 35 IAC §§ 722.134(a)(1)(A) and 725.273(a) [40 C.F.R. § 262.34(a)(i) and 265.173(a)].

4. Failure to inspect areas where containers were stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors, in violation of 35 IAC §§ 722.134(a)(1)(A) and 725.274 [40 C.F.R. §§ 262.34(a)(1)(i) and 265.174].

5. Failure to place accumulation of hazardous waste in containers, tanks, containment buildings or on drip pads in violation of 35 IAC § 722.134(a) [40 C.F.R. § 262.34(a)(1)].

6. Failure to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment in violation of 35 IAC § 725.131 [40 C.F.R. § 265.31].

7. Failure to ensure that facility personnel had successfully completed a program of classroom instruction or on-the-job training that taught them to perform their duties in a way that ensured the facility's compliance with applicable hazardous waste storage facility performance standards, that they had reviewed such training annually, that the program was directed by a person trained in hazardous waste management procedures, and that the instruction had taught facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed, and failure to keep hazardous management training records in violation of 35 IAC § 725.116(a)-(e) [40 C.F.R. § 265.16(a)(1)-(3),(b),(c),(d)(1)-(4) and (e)].

8. Failure to submit a copy of the facility contingency plan to all local police departments, fire departments, hospitals and local response teams that may be called upon to provide emergency services, in violation of 35 IAC §§ 722.134(a)(4) and 725.153(a) and (b) [40 C.F.R. §§ 262.34(a)(4) and 265.53 (a) and (b)].

9. Failure to update the facility contingency plan to reflect changes in the facility's emergency response, changes in information regarding emergency coordinators and changes in information regarding equipment, in violation of 35 IAC §§ 722.134(a)(4) and 725.154(c), (d) and (e) [40 C.F.R. §§ 262.34(a)(4) and 265.54(c), (d) and (e)].

10. Failure to make Land Disposal Restriction (LDR) determinations and/or provide LDR determination notifications for all hazardous wastes shipped off-site from the facility for the years 2005, 2006, and 2007, in violation of 35 IAC § 728.107(a) [40 C.F.R. § 268.7(a)].

11. Failure to keep records all LDR determination notifications made for hazardous wastes shipped off-site from the facility for the years 2005, 2006, and 2007, in violation of 35 IAC § 728.107(a)(8) [40 C.F.R. § 268.7(a)(8)].

12. Failure to attempt to make arrangements to familiarize: 1) police and fire departments with the layout of the facility, the properties of the hazardous waste handled at the facility, etc.; and 2) local hospitals with the properties of the hazardous waste handled at the facility and the types of injuries that could result from fires, or explosions at the facility, in violation of 35 IAC § 725.137 [40 C.F.R. § 265.37].

13. Failure to keep copies of the facility's 2005, 2006, and 2007 hazardous waste annual reports at the time of the inspection, in violation of 35 IAC § 722.140(b) [40 C.F.R. § 262.40(b)].

14. By virtue of Eagle Electronics' failure to comply with the container management, inspection, training, preparedness and prevention and contingency plan requirements for a hazardous waste permit exemption, Eagle Electronics became the owner and operator of a hazardous waste treatment, storage, or disposal facility, and Eagle Electronics failed to apply for and obtain a hazardous waste storage permit, in violation of Section 3005 of RCRA, 42 U.S.C. § 6925(a), 35 IAC §§ 703.121(a) and (b), 703.180(c), and 705.121(a) [40 C.F.R. §§ 270.1(c) and 270.10(a) and (d)].

RCRA is a cradle-to-grave framework to ensure proper management of hazardous wastes which, if handled in an unsafe manner, could present risks to humans and the environment. In addition, this letter informs you that EPA deems Eagle Electronics to be a Significant Non-Complier under RCRA.

Based on information currently available to us, we plan to propose a penalty of \$573,890 in the complaint. This letter is not a demand to pay a penalty. We will not ask you to pay a penalty until we file the complaint or a final order. Before filing the complaint, we are giving you the opportunity to present any information that you believe we should consider. Relevant information might include evidence that you did not violate the law; evidence that you relied on compliance assistance from EPA or a state agency; evidence that we identified the wrong party; or financial data bearing on your ability to pay a penalty.

If you believe that you will be unable to pay a \$573,890 penalty because of financial reasons, we will consider Eagle Electronics' ability to pay prior to finalizing our penalty proposal, provided that you send to us relevant and reliable financial documentation to support such a claim. For us to assess your ability to pay a penalty, please submit the following information:

(1) true, accurate and complete copies of the complete, signed and filed federal and state corporate income tax returns of Eagle Electronics, including all schedules, forms, statements, balance sheets and other attachments, for the years 2006 through 2009;

(2) true, accurate and complete copies of Eagle Electronics= complete financial statements, preferably audited, including all balance sheets, income statements, statements of operations, statements of retained earnings, statements of cash flows, and all notes to each financial statement, for the years 2006 through 2009;

(3) true, accurate and complete copies of all financial projections developed by or on behalf of Eagle Electronics for the years 2010 and 2011, including but not limited to projected income statements, balance sheets, and analyses of projected cash flows, whether month-by-month, by quarter, or for the year;

(4) true, accurate and complete copies of all company asset depreciation schedules, cumulative for the most recent five years;

(5) true, accurate and complete copies of all mortgage and other debt statements related to all the outstanding debts of Eagle Electronics, which indicate the original date of each debt, repayment terms, and current debt balances; and

(6) true, accurate and complete copies of all insurance policies which may provide coverage or reimbursement for any costs (past or future) incurred in addressing the violations described above in this letter, and all insurance policies which may provide coverage for any penalties, attorneys= fees, or other costs incurred in connection with litigation related to the violations described above in this letter.

You may assert a claim of business confidentiality under 40 C.F.R. part 2, subpart B, for any portion of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. part 2, subpart B. If you fail to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it.

Within 20 calendar days after you receive this letter, please send any written response to:

Diane M. Sharrow
Environmental Scientist and Senior Inspector (LR-8J)
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

If you want to confer with us, you should contact Ms. Sharrow, of the RCRA Branch, in writing within 20 calendar days after you receive this letter. Please be advised that this conference is not a settlement negotiation covered by Federal Rule of Evidence 408; we may use any information you submit in support of an administrative, civil or criminal action. After the conference (or after you have submitted a written reply if we do not have a conference), we may give you the opportunity to engage in settlement negotiations before we file the complaint. If

pre-filing settlement negotiations commence and are successful, a settlement agreement can be filed under EPA regulations at 40 C.F.R. § 22.13(b).

If you do not respond to this letter, EPA may file a complaint without further notice against Eagle Electronics as authorized under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a).

A copy of the document titled "U.S. EPA Small Business Resources" is enclosed for your reference. If you have any questions, please telephone Mark J. Palermo, Associate Regional Counsel, at (312) 886-6082.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Willie H. Harris".

Willie H. Harris, P.E. Chief
RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

* REPLY TO THE ATTENTION OF:

FEB 6 3 2010

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gary King
Acting Chief
Bureau of Land
Illinois Environmental Protection Agency
1021 North Grand Avenue, East
Springfield, Illinois 62702

Re: Eagle Electronics, Incorporated
EPA I.D. No.: ILD 981 088 800

Dear Mr. King:

Pursuant to Section 3008(a)(2) of the Resource Conservation and Recovery Act (RCRA), as amended, I am providing notice to you that the U.S. Environmental Protection Agency is preparing to issue an administrative Complaint under Section 3008(a)(1) to Eagle Electronics, Incorporated, 1735 Mitchell Boulevard, Schaumburg, Illinois. The Complaint is in response to the December 12, 2007 compliance evaluation inspections by the EPA, and addresses violations of Title 35 of the Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR).

If you have any questions regarding this letter, please contact Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,

A handwritten signature in cursive script that reads "Willie H. Harris".

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

FEB 11 2008

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mike Kalaria
Chief Executive Officer
Eagle Electronics, Incorporated
1735 Mitchell Boulevard
Schaumburg, Illinois 60193

Re: Notice of Violation
Eagle Electronics, Incorporated
U.S. EPA ID. NO.: ILD 981 088 800

Dear Mr. Kalaria:

On December 12, 2007, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Eagle Electronics, Incorporated (Eagle Electronics or the facility) located in Schaumburg, Illinois. The purpose of the inspection was to evaluate Eagle Electronics' compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on the U.S. EPA's December 12, 2007, inspection that included personal observations made by the inspector, and a subsequent review of records and information provided by Eagle Electronics personnel, U.S. EPA finds that Eagle Electronics is engaged in the management of hazardous waste without a hazardous waste permit, and is in violation of the requirements of the Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste treatment, storage or disposal permit, Eagle Electronics must be in compliance with the conditions of 35 IAC § 722.134(a) and (c) [40 CFR § 262.34(a) and (c)].

Specifically, we find that Eagle Electronics is in noncompliance with the following conditions for a hazardous waste storage permit exemption, and in violation of the following requirements:

1. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must mark hazardous waste accumulation containers with the words,

"Hazardous Waste" or with other words that identify the contents of the containers. See 35 IAC § 722.134 (a)(1)(A) and 722.134 (c)(1)(b) [40 CFR § 262.34 (a)(1)(i) and 262.34 (c)(1)(ii)]. At the time of the inspection, Eagle Electronics had not marked two containers of hazardous waste in the Wastewater Treatment Area.

2. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must mark and make visible the date upon which accumulation begins on each hazardous waste accumulation container. See 35 IAC § 722.134 (a) (1) (A) and 722.134(a) (2) [40 CFR § 262.34 (a) (1) (i) and 262.34 (a) (2)]. At the time of the inspection, Eagle Electronics had not dated one container of hazardous waste.

3. To avoid the need for a hazardous waste storage permit, a large quantity generator must close each container holding hazardous waste except when it is necessary to add or remove waste. See 35 IAC § 722.134 (d) (2) and 725.273 (a) [40 CFR § 262.34 (d) (2) and 265.173 (a)]. At the time of the inspection, Eagle Electronics had not closed two accumulation containers holding hazardous waste in the Wastewater Treatment Area when hazardous waste was neither being added or removed.

4. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit or interim status, provided that the hazardous waste is placed in containers, tanks or on drip pads and the generator complies with the applicable requirements. See 35 IAC § 722.134 (a) (1) (i)-(iii) [40 CFR § 262.34 (a) (1) (i)-(iii)]. At the time of the inspection, Eagle Electronics had accumulated hazardous waste on the floor adjacent to the hazardous waste container and filter press.

5. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must inspect areas where hazardous waste containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. See 35 IAC § 722.134 (a) (1) (A) and 725.274 [40 CFR § 262.34 (a) (1) (i) and 265.174]. At the time of the inspection, Eagle Electronics stated that it had not inspected areas where containers were stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

6. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must mark a hazardous waste satellite accumulation container with the words, "Hazardous Waste" or with other words that identify the contents of the container. See 35 IAC § 722.134 (c) (1) (B) [40 CFR § 262.34 (c) (1) (ii)]. At the time of the inspection, Eagle Electronics had not marked one satellite accumulation container of hazardous waste located under the filter press with the words, "Hazardous Waste" or with other words identifying the contents of the container.

7. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must maintain the facility so as to minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or

surface water which could threaten human health and environment. See, 35 IAC § 722.134 (a) (4) and 725.131 [40 CFR § 262.34 (a) (4) and 265.31]. At the time of the inspection, Eagle Electronics did not maintain the facility with regard to the F006 hazardous waste and liquid waste on the floor of the Wastewater Treatment Area.

8. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must ensure that facility personnel complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with applicable hazardous waste storage facility performance standards and that they review such training annually. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. See 35 IAC § 722.134 (a) (4) and 725.116 (a)-(e) [40 CFR § 262.34 (a)(4) and 265.16 (a)(1)-(3), (b), (c), (d)(1)-(4) and (e)]. At the time of the inspection, Eagle Electronics could not confirm whether it had ensured that facility personnel had completed a program of classroom instruction or on-the-job training that taught them to perform their duties in a way that ensures the facility's compliance with applicable hazardous waste storage facility performance standards, that they had reviewed such training annually, that the program was directed by a person trained in hazardous waste management procedures, and that the instruction had taught facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

9. A large quantity generator of hazardous waste must also maintain the job title for each position at the facility related to hazardous waste management, the name of the employee filling each job, as well as a written job description, a written description of the training, and training records on current and former employees. See 35 IAC § 722.134(a) (4) and 725.116 (a)-(e) [40 CFR § 262.34 (a)(4) and 265.16 (a)(1)-(3), (b), (c), (d)(1)-(4) and (e)]. At the time of the inspection, Eagle Electronics also had not ensured that the job title for each position at the facility related to hazardous waste management, the name of the employee filling each job, as well as a written job description, a written description of the training, and training records on current and former employees were maintained.

10. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must attempt to make arrangements to familiarize: 1) police and fire departments with the layout of the facility, the properties of the hazardous waste handled at the facility, etc., and 2) local hospitals with the properties of the hazardous waste handled at the facility and the types of injuries that could result from fires, or explosions at the facility. See 35 IAC § 722.134 (a) (4) and 725.137 [40 CFR § 262.34 (a) (4) and 265.37]. At the time of the inspection, Eagle Electronics could not provide information substantiating that it had attempted to make arrangements to familiarize the local hospitals with the properties of the hazardous waste handled at the facility and the types of injuries that could result from fires, or explosions at the facility.

11. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must maintain a copy of the facility contingency plan at the facility and submit a copy of the facility contingency plan to all local police departments, fire departments, hospitals and local response teams that may be called upon to provide emergency services. See 35 IAC § 722.134 (a) (4) and 725.153 (a) and (b) [40 CFR § 262.34 (a) (4) and 265.53 (a) and (b)]. At the time of the inspection, Eagle Electronics could not demonstrate that it had submitted a copy of the facility contingency plan to all local police departments, fire departments, hospitals and local response teams that may be called upon to provide emergency services.

12. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must review and revise the facility contingency plan when the facility changes in a way that modifies the emergency response necessary, when information regarding the emergency coordinators changes, or when equipment changes. See 35 IAC § 722.134 (a) (4) and 725.154 (c), (d) and (e) [40 CFR § 262.34 (a) (4) and 265.54 (c), (d) and (e)]. At the time of the inspection, Eagle Electronics' February 28, 2003, integrated contingency plan (Spill Control and Countermeasure Plan or SPCC Plan), had not been updated to reflect changes in the facility's emergency response, changes in information regarding emergency coordinators and changes in information regarding equipment.

13. A large quantity generator of hazardous waste which accumulates hazardous waste on-site for 90 days or less, and which does not meet the conditions for a hazardous waste permit exemption of 35 IAC § 722.134 (a) [40 CFR § 262.34 (a)], is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See 35 IAC § 703.121(a) and (b), 703.180 (c) and 705.121 (a) [40 CFR § 270.1 (c), 270.10 (a) and (d)]. By virtue of its failure to comply with the container management, inspection, training, preparedness and prevention and contingency plan requirements for a hazardous waste permit exemption, Eagle Electronics became the owner or operator of a hazardous waste treatment, storage or disposal facility. Eagle Electronics failed to apply for and obtain a hazardous waste storage permit, and Eagle Electronics' failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC § 703.121 (a) and (b), 703.180 (c) and 705.121 (a) [40 CFR § 270.1 (c), 270.10 (a) and (d)].

14. A large quantity generator of hazardous waste must keep a copy of each annual report for three years from the due date of the report. See 35 IAC § 722.140 (b) [40 CFR § 262.40 (b)]. Eagle Electronics failed to keep copies of each annual report from March 1, 2005.

15. A large quantity generator of hazardous waste must determine if the waste is a hazardous waste for purposes of compliance with the land disposal restrictions under 35 IAC § 728.107 [40 CFR § 268.7]. See 35 IAC § 722.111 (c) [40 CFR § 262.11(c)]. At the time of the inspection, Eagle Electronics had not determined whether all its wastes were hazardous wastes for which compliance with the land disposal restrictions was required, and did not keep signed records of these determinations.

At this time, U.S. EPA is not requiring Eagle Electronics to apply for a hazardous waste treatment, storage or disposal permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of the RCRA, U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements. However, please be advised that Eagle Electronics' compliance with the conditions and requirements described above will not relieve Eagle Electronics of its liability for the violations identified in this letter. U.S. EPA reserves the right to bring further enforcement actions (including an action for civil penalties) against Eagle Electronics for the violations identified in this letter.

You should submit your response to Diane Sharrow, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Sharrow, of my staff, at (312) 886-6199.

Sincerely,



Willie H. Harris, P.E.

Chief, RCRA Branch

Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Eagle Electronics, Incorporated

U.S. EPA ID. No.: ILD 981 088 800

LOCATION ADDRESS: 1735 Mitchell Boulevard, Schaumburg, Illinois 60193

NAICS CODE: 334412

DATE OF INSPECTION: December 12, 2007

U.S. EPA INSPECTOR: Diane M. Sharrow

PREPARED BY: 

Diane M. Sharrow
Senior Inspector/Environmental Scientist


Date

REVIEWED BY: 

Mary S. Setnicar, Acting Chief
Compliance Section 1
RCRA Branch

1/14/08
Date

Purpose of Inspection

The purpose of the inspection was to conduct a compliance evaluation inspection (CEI) at Eagle Electronics, Incorporated (Eagle Electronics), located at 1735 Mitchell Boulevard, Schaumburg, Illinois 60193, to evaluate Eagle Electronics' compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically those regulations related to the management of hazardous waste.

I gave the following documents to Mike Kalaria, Chief Executive Officer: U.S. EPA OECA Small Business Information Sheet, U.S. EPA OECA Innovative Solutions to Your Environmental Challenges Sector Specific Resources, U.S. EPA OECA List of Compliance Assistance Centers and U.S. EPA OECA's Let EPA Help You Find The Way Starting with a Few keystrokes, as well as the U.S. EPA Region 5 List of Pollution Prevention Contacts, and the Illinois Waste Management and Research Center Sustainable Solutions Brochure.

Background

A CEI to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically those regulations related to the management of hazardous waste, has never been conducted at this location by the United States Environmental Protection Agency (U.S. EPA) or the Illinois Environmental Protection Agency (Illinois EPA). However, Illinois EPA did conduct a compliance assistance visit at this location on February 28, 2000.

Eagle Electronics notified U.S. EPA of its hazardous waste activities as large quantity generator of hazardous waste at the Schaumburg location on or about May 20, 1985. Eagle Electronics is currently a large quantity generator of hazardous waste.

Plant Description and Process

Eagle Electronics is located in an industrial area with residences immediately to the east. Eagle Electronics manufactures printed circuit boards. Process additives include copper sulfate, tin sulfate, nickel, gold and alkaline etch materials.

Based on my review of Eagle Electronics' 2007 hazardous waste manifests, hazardous waste generated at the facility in 2007 includes waste water treatment filter cake (F006) and waste cyanide spent immersion plating solution (D003 and F007).

Opening Conference

I arrived at Eagle Electronics at approximately 1:30 PM CST. I presented my enforcement credentials to an employee who met me in the foyer of the building. He notified Mike Kalaria, the Chief Executive Officer at Eagle Electronics. When Mr. Kalaria arrived, I presented my enforcement officer credentials to him, and explained that I wished to conduct an unannounced hazardous waste inspection that included a visual site inspection (VSI) and a records review.

I told Mr. Kalaria that I would like to begin the CEI with a visual site inspection, and finish the CEI with a records review. Mr. Kalaria agreed to accompany me on the VSI.

During the CEI I took 37 photographs with a Nikon Cool pix digital camera, with 8.1 megapixel resolution. I took 30 photographs during the VSI and 7 photographs at the conclusion of the CEI. These 37 photographs are attached to this inspection report. They are true and representative of the conditions I observed on the date of the CEI, but it should be noted that the time indicated on the photographs is EST and not CST.

Visual Site Inspection

I began the VSI in the hallway that runs west to east down the middle of the facility. We entered the Plating Room where Mr. Kalaria indicated that all process wastewater from the etching and reflow department, as well as the laboratory are piped to a pre-treatment pit (Photographs 1 and 2) in the waste water treatment area for pH adjustment. Mr. Kalaria also indicated that process wastewater from the screening department, the photo department, and the multilayer department is piped directly to the facility sewer. Mr. Kalaria explained to me that the trench in the Plating Department also discharges directly to the wastewater pre-treatment pit where pH is adjusted prior to being pumped to an equalization tank and then to metal precipitating. We then went on to the wastewater treatment area.

Mr. Kalaria indicated that once wastewater enters the pre-treatment pit located in the waste water treatment area, chemicals are added, and the wastewater flows by gravity to a flocculating compartment of the clarifier where a polymer is introduced prior to discharge from the clarifier. He stated further that clarified effluent is then pumped through the sand filter prior to sewerage, and the precipitated solids are then removed by dewatering in the filter press.

I found it difficult to determine what containers and tanks in the wastewater treatment area were part of the wastewater treatment system (Photographs 3, 4 and 7). I asked Mr. Kalaria to point out to me how the wastewater treatment process worked so I could photograph the process in order. Mr. Kalaria indicated that none of the containers in the wastewater treatment area contained hazardous waste, but were either empty or contained product. According to Mr. Kalaria, the wastewater is transferred from the pre-treatment pit (Photographs 1 and 2) to a series of two tanks (Photographs 5 and 6), then piped to the clarifier (Photograph 8) with solids going to the filter press (Photograph 17) and liquids entering the sand filter (Photographs 8, 10, 11 and 12). Liquids from the sand filter are then sent to a tank (Photographs 13, 14 and 15) which empties into a "raised manhole" (Photographs 15 and 16).

I noted liquids on the floor of the wastewater treatment room adjacent to the clarifier (Photograph 9), between the sand filter and the receiving tank (Photograph 14) and near the raised manhole (Photographs 15, 16 and 20). I also noted a white polyvinyl tote container (Photographs 15, 16, 18 and 23) that appeared to contain wastewater treatment sludge or F006. When I asked Mr. Kalaria, he confirmed that the container contained hazardous wastewater treatment sludge or F006. I noted that the container was open and indicated to Mr. Kalaria that

all containers of hazardous waste must be kept closed when not in use. I also noted that the container was not dated and was not labeled with the words, "Hazardous Waste", or other words that identified the contents. Under the filter press (Photographs 17 and 21) I also noted an open satellite accumulation container that contained a very small amount of F006, that was not labeled words, "Hazardous Waste", or other words that identified the contents.. I also noted that there was F006 on the floor near the filter press and the polyvinyl tote container (Photographs 16, 17, 18, 20, 21 22 and 23).

During the VSI I asked Mr. Kalaria about several other tanks and containers in the wastewater treatment area, including a square container or tank above the filter press (Photograph 17), and a tank located immediately adjacent to the polyvinyl tote (Photograph 19). Mr. Kalaria indicated that the tank above the filter press was empty and he only used it when necessary to hold liquid when the waste water treatment process tanks could not contain all the liquid to be treated. He also indicated that the tank adjacent to the polyvinyl tote contained ferric chloride solution that was a product. I told Mr. Kalaria that any tank or container used to accumulate and manage any hazardous waste prior to wastewater treatment or shipment off-site, needs to be dated and labeled and meet either the container or tank hazardous waste management standards.

Mr. Kalaria and I then proceeded to the etch and reflow area. Mr. Kalaria indicated that there were two tanks at the south end of the room in a smaller room (Photographs 26 and 27). Mr. Kalaria explained that they had been required by the Village of Schaumburg to add a door and wall on top of the retaining wall when they recently replaced the tanks. I noted there were two tanks in this small room. According to Mr. Kalaria, the tank to the east contains spent etching that Eagle Electronics sends off-site for recycling while the tank to the west contains ammonia (Photographs 24 and 25).

Mr. Kalaria and I then exited Eagle Electronics building to the east where I observed the north side of the building (Photograph 28), the east side of the building (Photographs 29 and 30). I noted a small three sided shed on the east side of the building that appeared to contain equipment. Mr. Kalaria confirmed that this storage area contained equipment not in use, and did not contain hazardous waste. I asked Mr. Kalaria if Eagle Electronics owned the vacant property immediately adjacent to the building on the south side. Mr. Kalaria stated that Eagle Electronics owned the property, but that it was for sale. He said the entire property had once been owned by General Motors – Caterpillar and that the buildings to the south had been torn down. Mr. Kalaria and I then re-entered the building and proceeded to a conference room at the front or west side of the building to start the Records Review.

Records Review

During the records review, I reviewed analytical results, hazardous waste manifests (manifests) and LDR certifications. I did not note any deficiencies with the manifests. I did note that Eagle Electronics does manifest hazardous waste filter cake (F006) off-site approximately every three weeks. I also noted that Eagle Electronics is sending the filter cake for recycling to Agmet (OHD986976348) in Maple Heights, Ohio and World Resources (PAD981038227) in Pottsville, Pennsylvania. I could only locate one Land Disposal Restriction (LDR) form during the

manifest review and it was for the December 5, 2007, shipment of F006 to World Resources. During my review of manifest I also noted that Micronutrients provides raw etchant to Eagle Electronics and that waste etchant is sent to Micronutrients on a Bill of Lading via Heritage Environmental Transport.

I did not review the Annual Reports because Mr. Kalaria could not locate the 2004, 2005 or 2006 Annual Hazardous Waste Reports. When I asked Mr. Kalaria if Eagle Electronics had a personnel training program, he stated they did, but he could not provide any records for my review.

During the Records Review, I also asked to review the facility Contingency Plan. Mr. Kalaria provided me with a copy of the facility's Spill Prevention Control and Countermeasure Plan (SPCC Plan) dated February 28, 2003, and prepared by LAICON, Incorporated (LAICON), Environmental Engineering services, 9914 Derby Lane, Westchester, Illinois 60154. Mr. Kalaria indicated that LAICON also prepared Eagle Electronics Annual hazardous Waste Reports. I asked Mr. Kalaria if he had a record of who had been sent to SPCC plan, and he indicated he did not. I noted that on page 3, Fred Skahan was listed as the Operations Manager and that Gordy Kissner was listed as President. They were also both listed as emergency coordinators along with Mr. Kalaria. I asked Mr. Kalaria if Mr. Skahan and Mr. Kissner were available. He responded that they were no longer with the company. I asked Mr. Kalaria if I could have a copy of the manufacturing Process Area layout and the Process Flow Diagram from the SPCC. He provided me with a copy of both diagrams.

Closing Conference

As part of the Closing Conference I indicated to Mr. Kalaria that I would send a letter to Eagle Electronics, along with the inspection report, checklist and photographs in the next few weeks. I also asked Mr. Kalaria if I could take some photographs of the south side of the building and he agreed (Photographs 31 through 37). After taking the photographs I concluded the CEI at approximately 2:45 PM and departed Eagle Electronics.

ATTACHMENT(S):

Inspection Checklist
Photographs (37)

Installation Name:
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U.S. EPA Inspector:
Diane Sharrow

EPA ID Number:
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November 12, 2007

CAV by JETPA 02/23/00 - no viol.

~ 1:30 - 2:45 pm
not 5/20/05

NAICS 334412

SIC 3672 ~ 75 employees M-F 2 shifts

RCRA GENERATOR INSPECTION CHECKLIST (PART 722)

Regulation		Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
	Section 722.111 Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? <i>Manufacture of printed circuit boards. Process additives include copper sulfate, tin sulfate, nichel, gold & alkaline etch materials.</i>	
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728?	
	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste?	
	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Did not evaluate
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number?	808.121(a)
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number?	
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site?	
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	(OVER)
722.120(b)	Does the manifest designate a facility permitted to handle the waste?	722.120(a)
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility?	722.120(b)
	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	Section 722.121 Acquisition of Manifests	
722.121(a)	Has the generator used:	722.120(d)
	- an Illinois manifest for wastes designated to a facility within Illinois?	
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Uniform Manifest started 09/10/06
722.121(b)	- a manifest from the State to which the manifest is designated?	722.121(a)
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own?	722.121(b)
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.122	Section 722.122 Number of Copies	
	Does the manifest consist of at least 6 copies?	
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
	Section 722.123 Use of the Manifest	
722.123(a)	For each manifest reviewed, has the generator:	
	- signed the certificate by hand?	
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- obtained the handwritten signature and the date of acceptance by the initial transporter?	722.123(a)
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- retained one copy as required by Section 722.140(a)?	
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days?	
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter?	722.123(b)
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Larry Detroja is Plating Mgr.

Manifest Review

micromutrients provides "raw" etchant and
Waste etchant is sent to Micromutrients on a
Bill of Lading via Heritage Env. Transporter

11/13/7 Manifest 4 bags F006 filter cake goes off
for recycling to Agmet in Ohio OH D986976348
Maple Hts, Ohio

12/5/7 3 bags F006 to World Resources / Agmet
W/LDR of ~~Maple Hts, Ohio~~ Pottsville, PA
DMS

PA D981 038237.

09/25/7 Manifest 55g (1) DF D003 Waste
Cyanide spent immersion plating solution.

10/24/7 3 bags F006

10/24/7 " "

09/25/7

8/28/7

08/30/7

09/12/7

05/23/7

05/28/7

08/01/7

also F002 gold (1)

D003 (1)

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	<p>has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes _____ No _____ N/A <u>X</u></p>	722.123(c)
722.130	<p>SUBPART C: PRE-TRANSPORT REQUIREMENTS</p> <p>Is there any hazardous waste ready for transport off-site? Yes _____ No <u>X</u> N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No _____ N/A <u>X</u></p>	722.130
(722.134(a))	<p>Section 722.134 Accumulation Time</p> <p>Has the generator complied with the following requirements: Yes <u>✓</u> No _____ N/A _____</p>	
(722.134(a)(1))	<p>A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <u>✓</u> No _____ N/A _____</p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <u>X</u></p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <u>X</u></p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A <u>X</u></p> <p><i>only product tanks & wastewater tanks</i></p>	
(722.134(a)(2))	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes _____ No <u>X</u> N/A _____</p>	
(722.134(a)(3))	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes _____ No <u>X</u> N/A _____</p>	
(722.134(a)(4))	<p>Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes _____ No <u>X</u> N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers? Yes <u>X</u> No _____ N/A _____</p> <p>If "No", go to Subpart J.</p>	
725.211 725.214	<p>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</p> <p>Has the generator closed an accumulation area? Yes _____ No <u>X</u> N/A _____</p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <u>X</u></p>	725.211 725.214

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input checked="" type="checkbox"/> No _____ N/A _____ COMMENTS:	
(725.278)	Section 725.278 Air Emission Standards Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Comments: Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Note: If "No", go to Subpart C.	
	SUBPART J: TANK SYSTEMS	
	Has the generator closed an accumulation area? Yes _____ No <input checked="" type="checkbox"/> N/A _____	725.211
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.214

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes _____ No <u>X</u> N/A _____</p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.291(a))	<p>For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____</p>	
(725.291(b))	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____</p> <p>2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____</p> <p>3) existing corrosion protection measures? Yes _____ No _____ N/A _____</p> <p>4) documented age of the tank system? Yes _____ No _____ N/A _____</p> <p>5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____</p> <p>*IRPE = Independent Registered Professional Engineer</p>	
(725.291(c))	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____</p> <p>Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	

per Mike Katoris, CEO

The trench in the plating dept. discharges directly to the WW pre-treatment pit for adj. treatment. Chemical is introduced & the treated effluent flows by gravity to a flocculating compartment of the clarifier where a polymer is introduced prior to discharge from clarifier. Clarified effluent is then pumped through a sand filter prior to sewerage. The precipitated solids are then dewatered in a filter press. No floor drains? Process WW is discharged to a pit from bench & is pH adjusted prior to being pumped to "equalization" tanks & metal precipitating. Via sump & thru series of tanks to filter press.

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.292(a))	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?</p> <p>Yes _____ No _____ N/A _____</p> <p>Does the assessment include, at a minimum, the following:</p> <p>1) design standards for tanks and ancillary equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) hazardous characteristics of the waste(s) to be handled?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic?</p> <p>Yes _____ No _____ N/A _____</p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.292(g))	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service?</p> <p>Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?</p> <p>Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?</p> <p>Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?</p> <p>Yes _____ No _____ N/A _____</p> <p>or</p> <p>if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?</p> <p>Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?</p> <p>Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?</p> <p>Yes _____ No _____ N/A _____</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____</p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes _____ No _____ N/A _____</p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____</p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____</p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily? Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes _____ No _____ N/A _____</p>	

DMG

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls? Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls? Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment? Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment? Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No _____ N/A _____</p>	

DMS

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Diane Sharrow

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	

Installation Name:
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U.S. EPA Inspector:
Diane Sharrow

EPA ID Number:
ILD981088800

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November 12, 2007

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none">- the resulting waste, mixture or dissolved material is no longer ignitable or reactive? <p>Yes _____ No _____ N/A _____</p> <ul style="list-style-type: none">- Section 725.117(b) is complied with? <p>Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?</p> <p>Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?</p> <p>Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?</p> <p>Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725?</p> <p>Yes _____ No _____ N/A _____</p> <p>Comments:</p>	
(725.131)	<p>SUBPART C: PREPAREDNESS AND PREVENTION</p> <p>Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(a))	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	

Emergency records
Mr. Skahan & Mr. Kissner
SPCC Plan dated 2/28/03
date of date
no record to
whom copies
were sent.

SPCC Plan Annual Report prepared by LAICON, Inc., Env. Engineering Services, 9914 Derby Lane, Westchester IL 60154. The date of SPCC Plan is 2/28/03. On p. 3 Fred Skahan, Oper. Mgr. & Gordy Kissner, Pres. are E.C.'s as well as Mike Kalaria, CEO.
Part 722 (LQG) - 10 of 14

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(a))	<p>Does the plan describe the actions required for response to:</p> <p>- fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(c))	<p>Does the plan describe arrangements with:</p> <p>- police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <p>- description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <p>- an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) submitted to:</p> <p>- police department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>- fire department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>- hospital? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>- emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) the facility changes in a way that modifies the emergency response necessary? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) information regarding emergency coordinators changes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>e) information regarding equipment changes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - communications or alarm systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	

no records

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <u>not available</u> No <u>not available</u> N/A <u>not available</u> Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <u>not available</u> No <u>not available</u> N/A <u>not available</u>	722.141(b)
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No _____ N/A <u>not available</u>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes _____ No _____ N/A <u>not available</u>	722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A <u>not available</u>	722.143
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes _____ No <u>not available</u> N/A <u>not available</u> If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A <u>not available</u>	722.150
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes _____ No <u>not available</u> N/A <u>not available</u> If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A <u>not available</u>	722.160
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes _____ No <u>not available</u> N/A <u>not available</u> If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A <u>not available</u>	722.170

Property originally a GM/Caterpillar operation. Bldg torn down & now owns vacant property.
Vill. of Schaumburg required a wall in add. to containment for Ammonia Tanks/Waste Etchant 2 years ago.

Eagle Electronics #LD 981 058800

Photograph 1

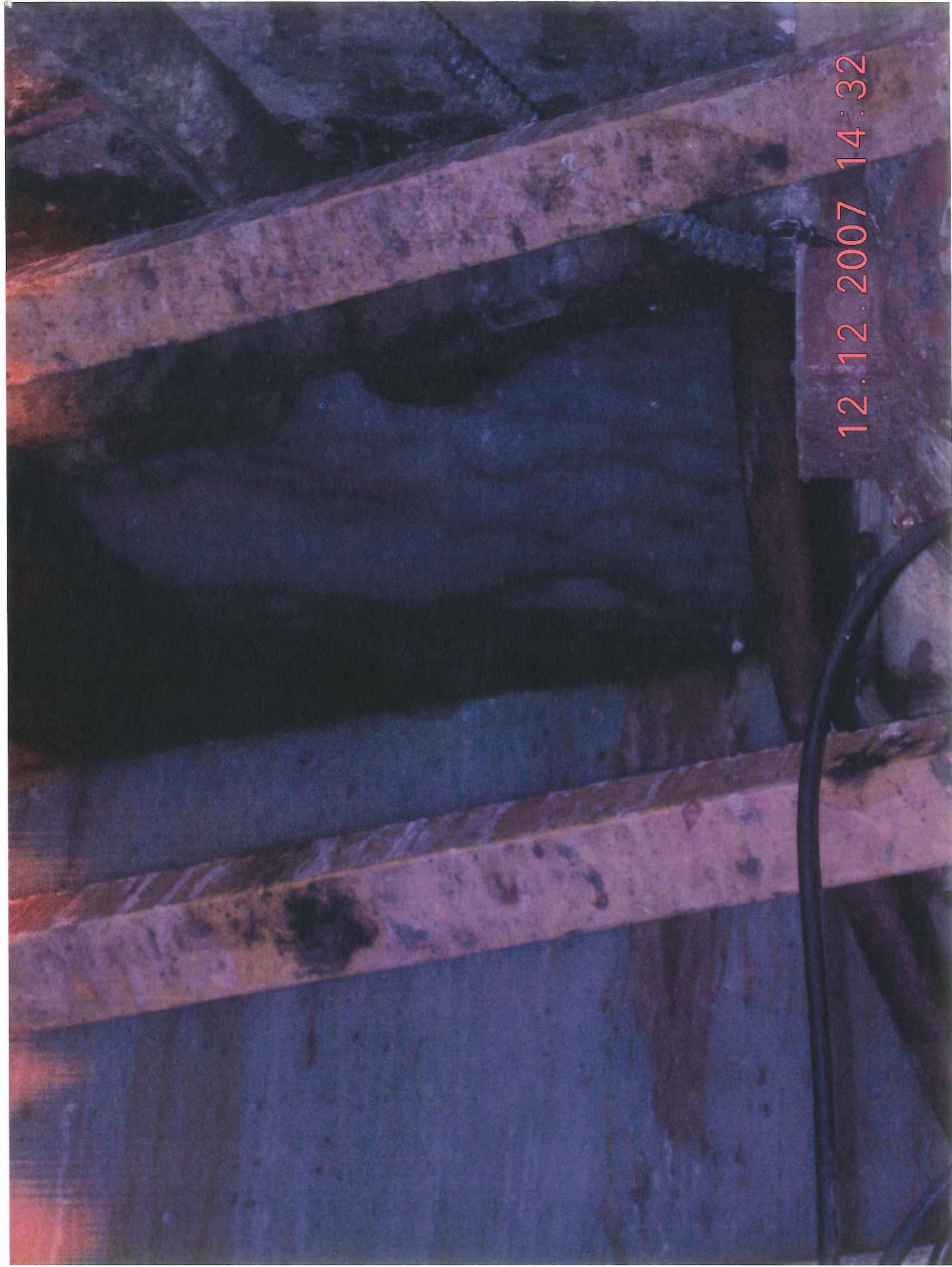


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Eagle Electronics ILP 981 088 800

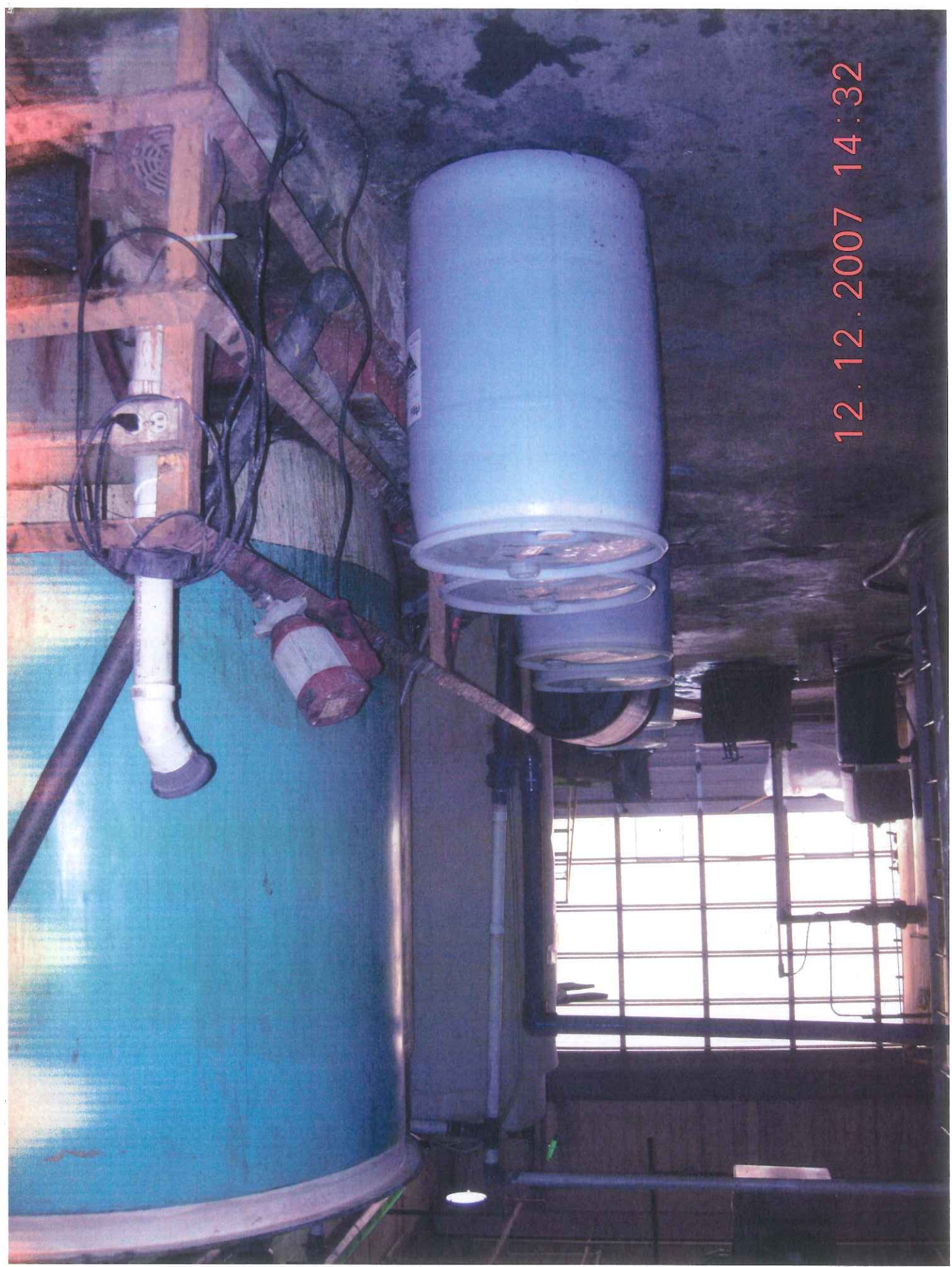
Photograph 2



Photograph 3

IL 981088800

Eagle Electronics



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Photograph 4

Eagle Electronics #LD 981088 800



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Eagle Electronics

FLD 981 088 800

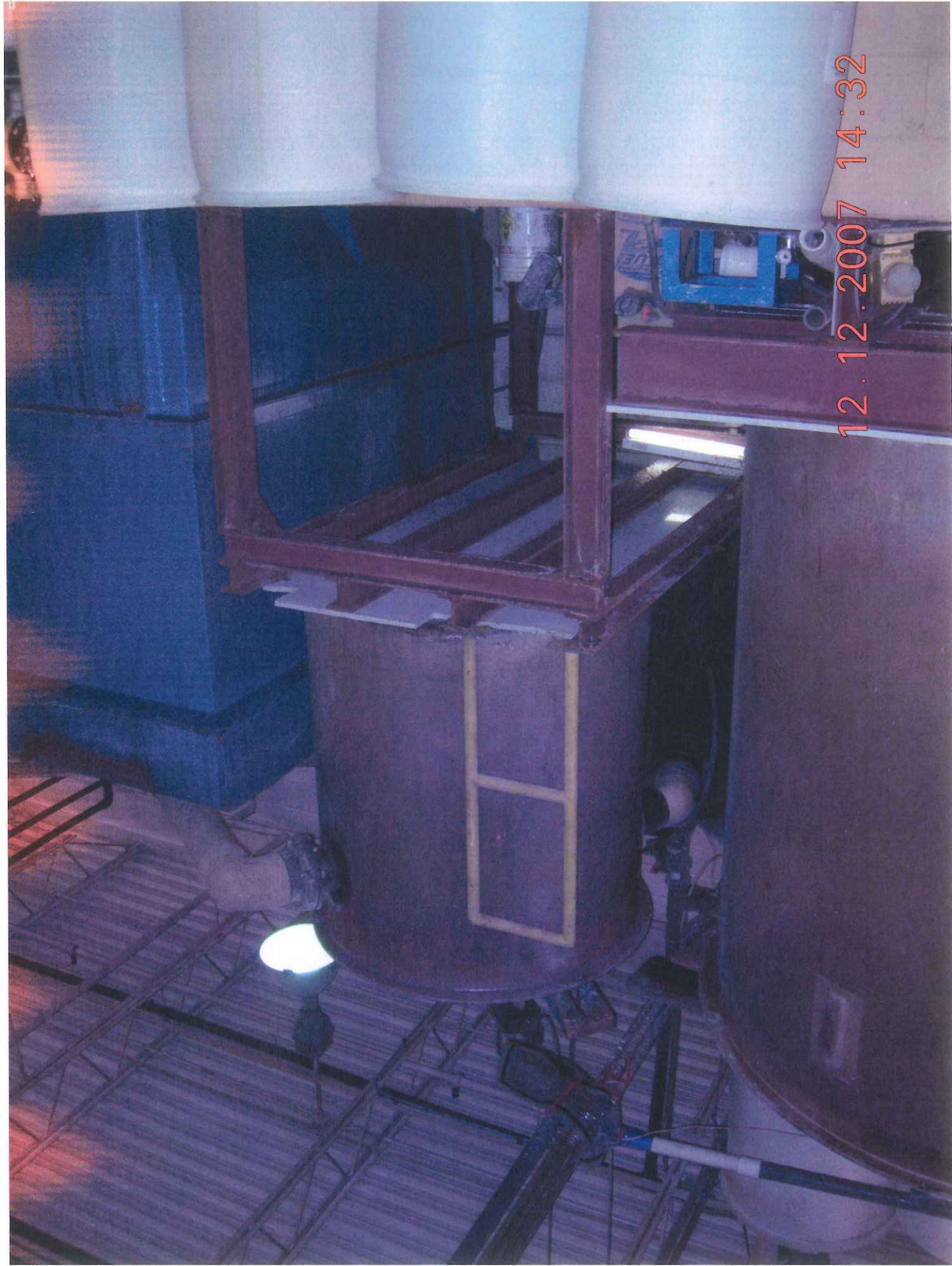
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Eagle Electronics FLD 981 088 800

Photograph b



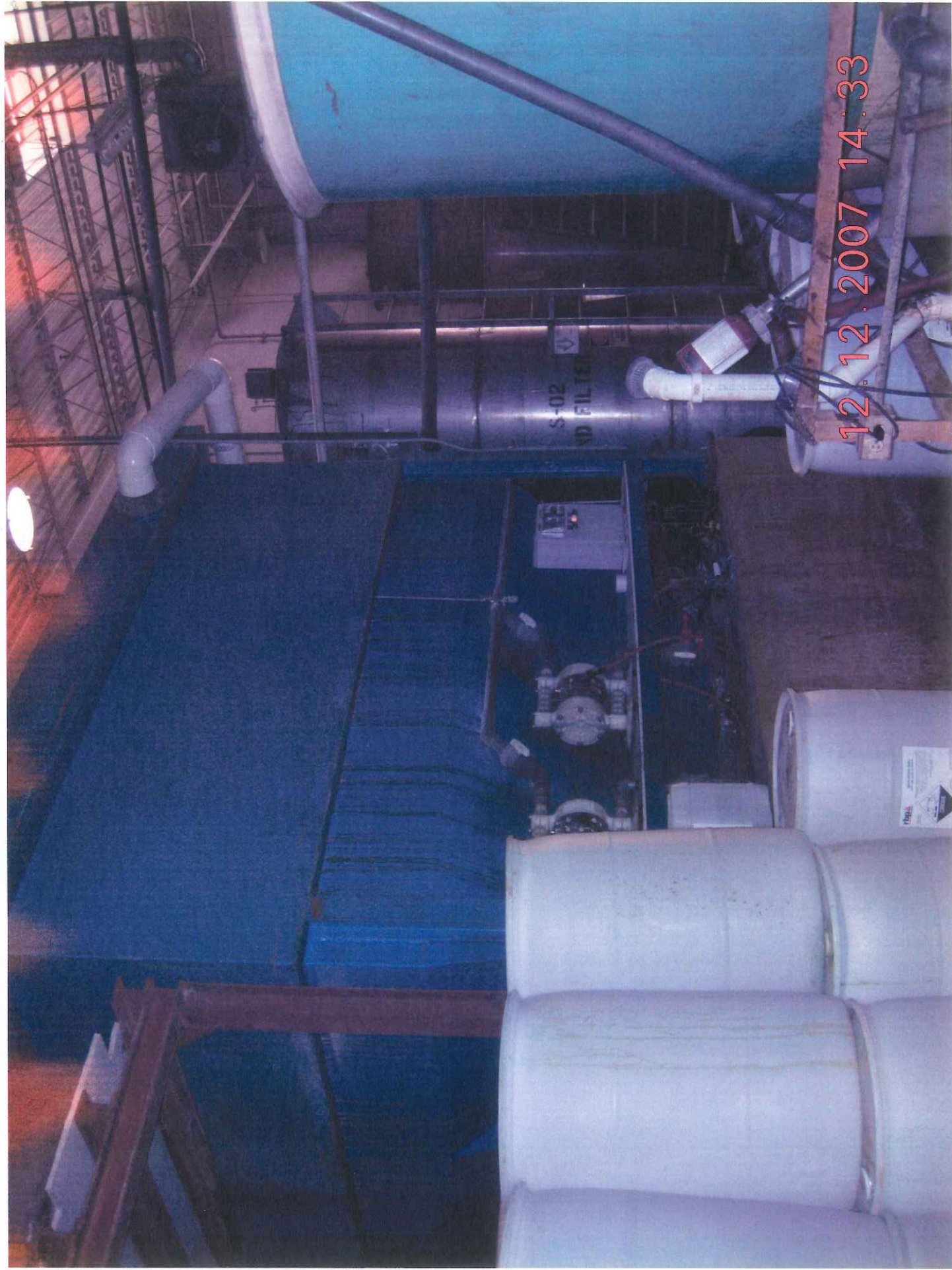
Eagle Electronics ID 981088 800

Photograph 7



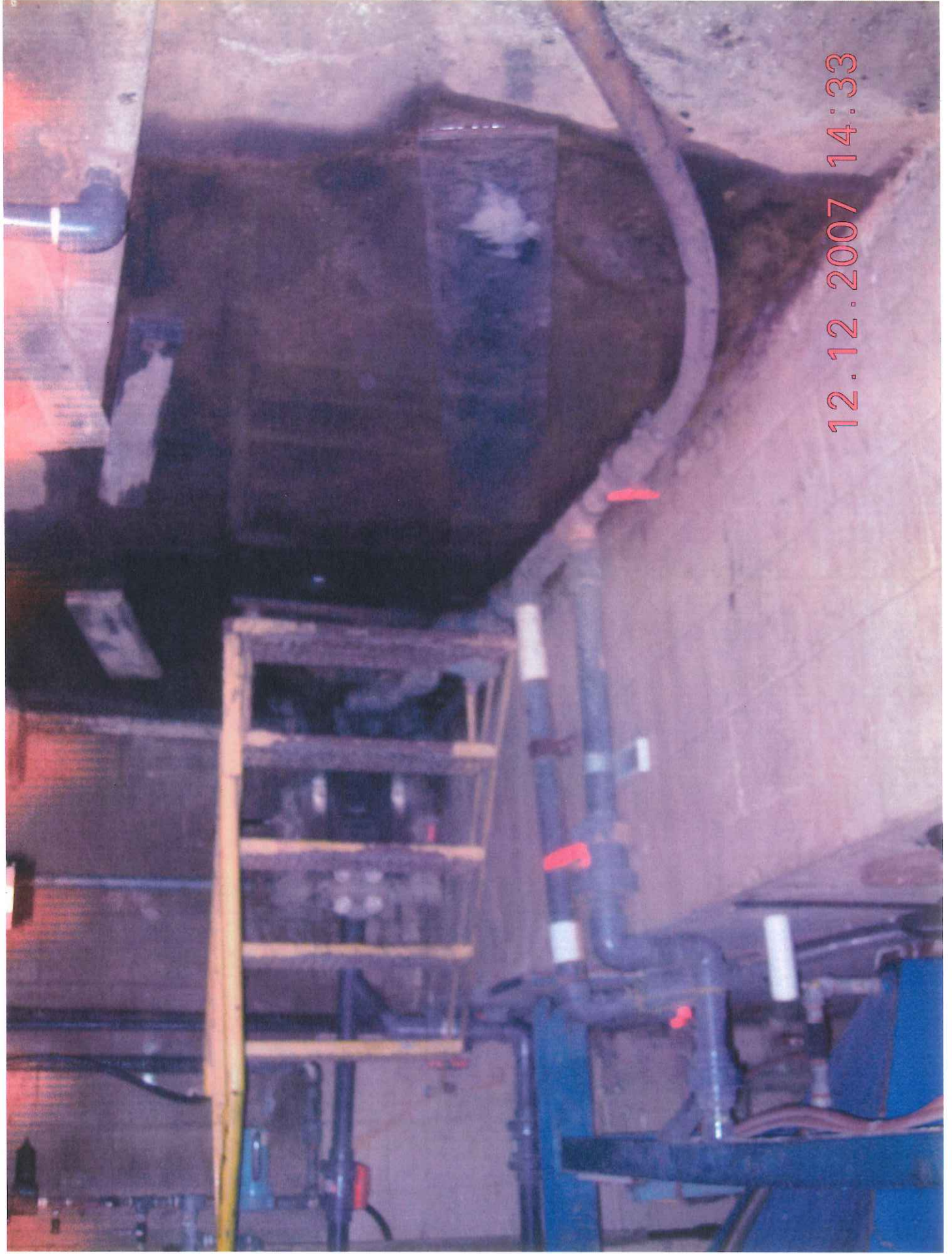
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Eagle Electronics I.D 981088 800 Photograph 9



12.12.2007 14:33

Photograph 10

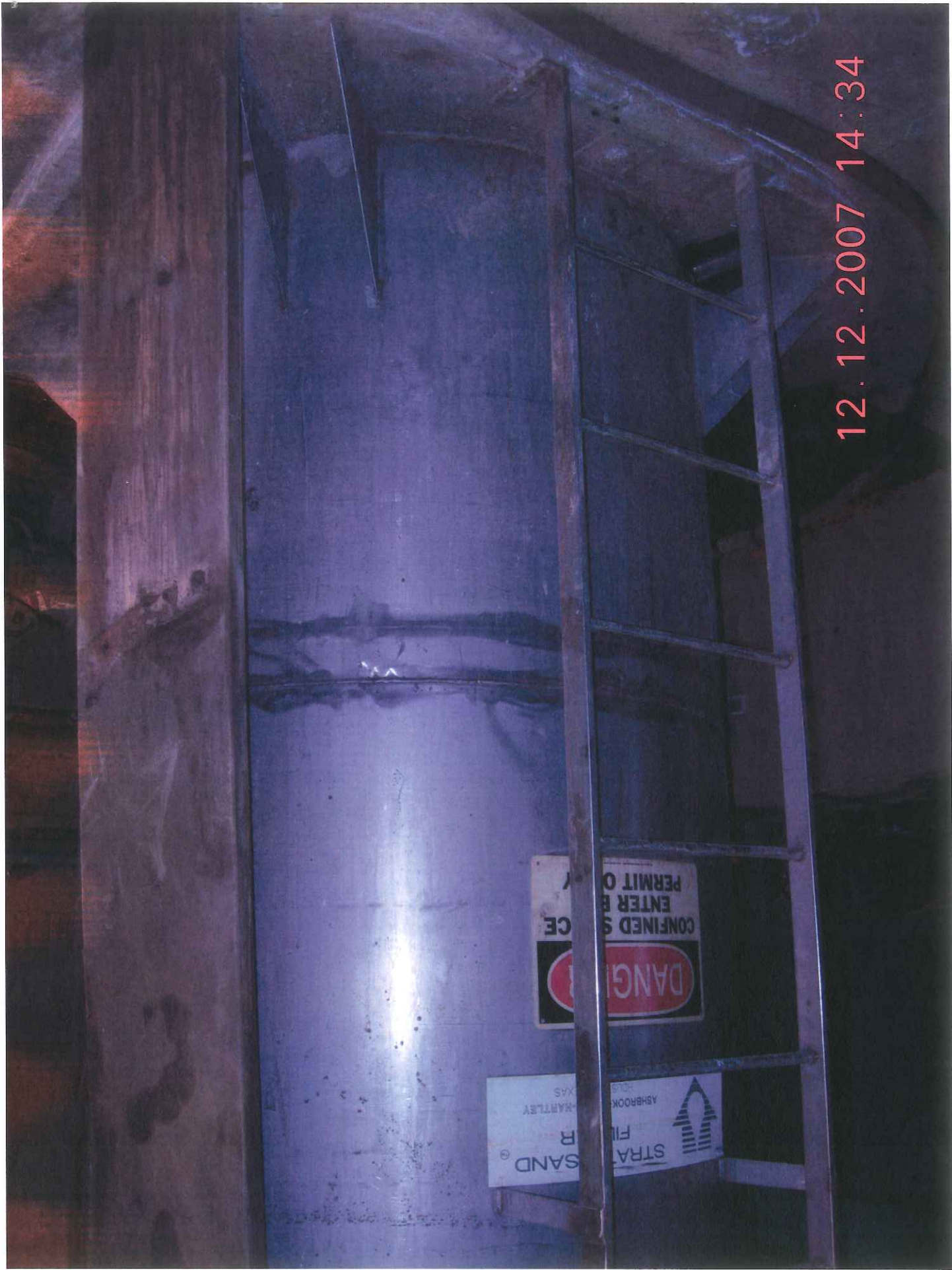
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Eagle Electronics LTD 981 088 800

Photograph 11



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Eagle Electronics FLD981 088 800

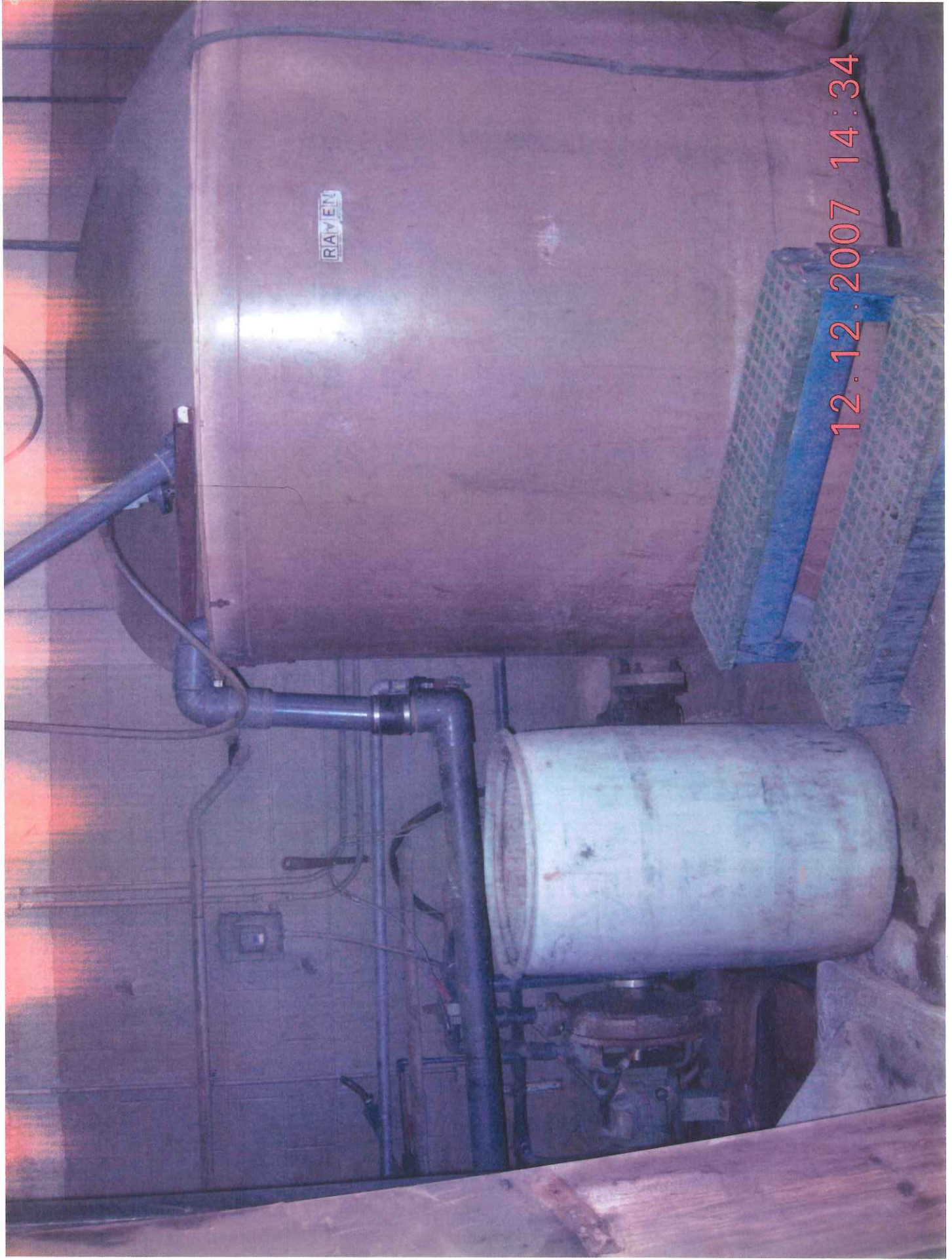
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Eagle Electronics
FID 981 088 800

Photograph 13



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Eagle Electronics
TEL 981 088 800

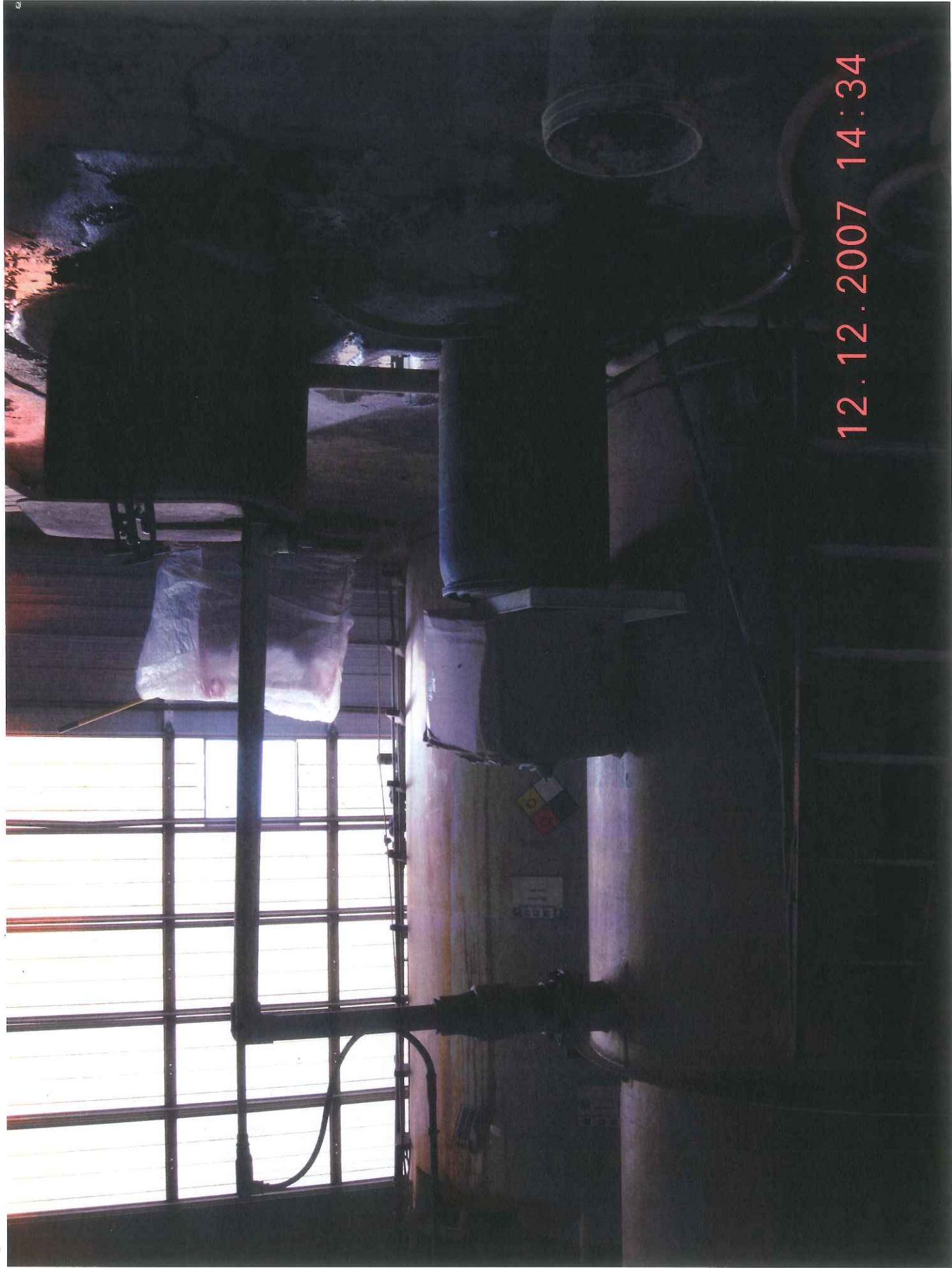
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Eagle Electronics
JLD 981 068 800

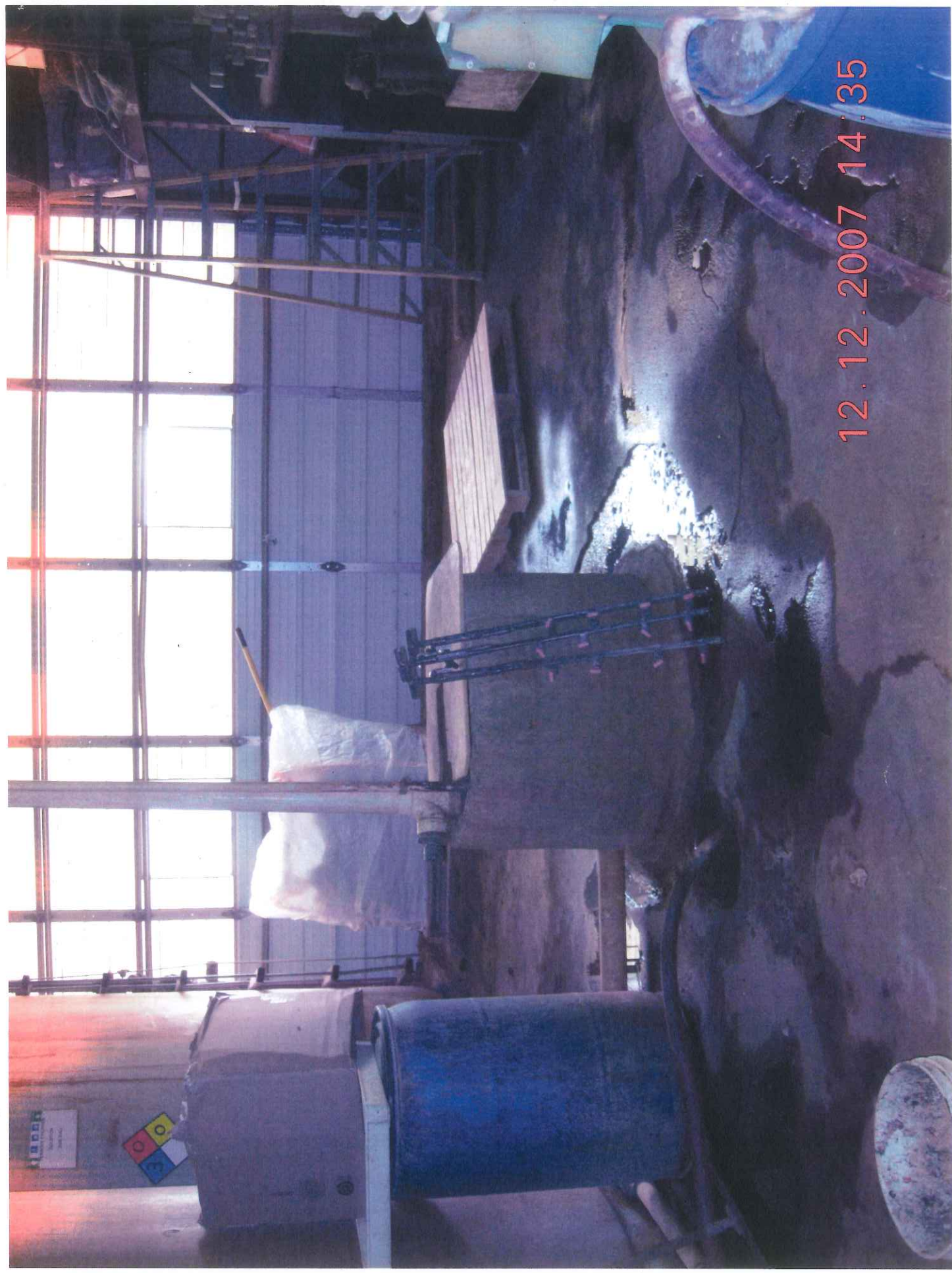
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Photograph 16

Eagle Electronics I.D. 981.088 800



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Eagle Electronics ILD981 088 800

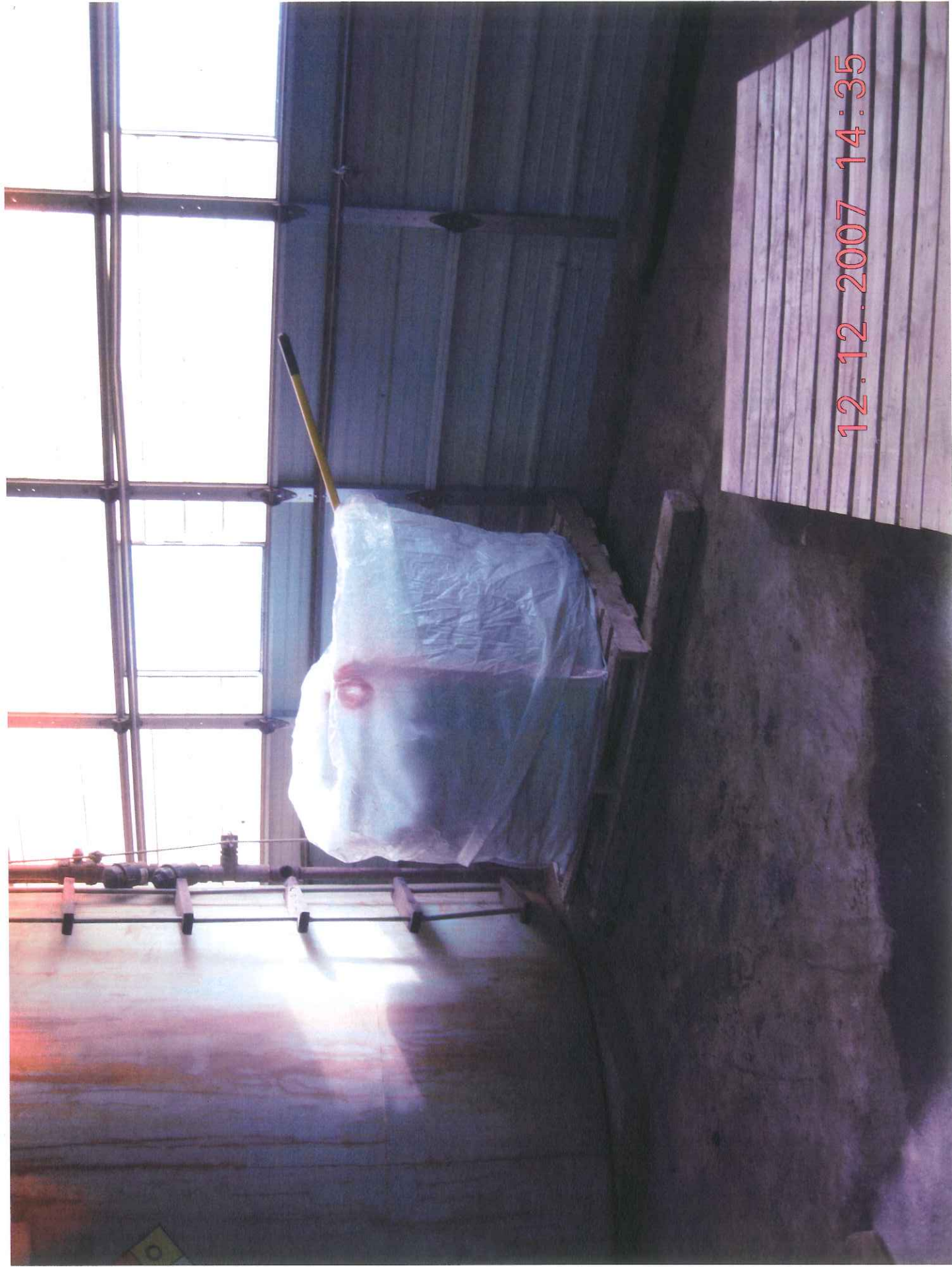
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12.12.2007 14:35

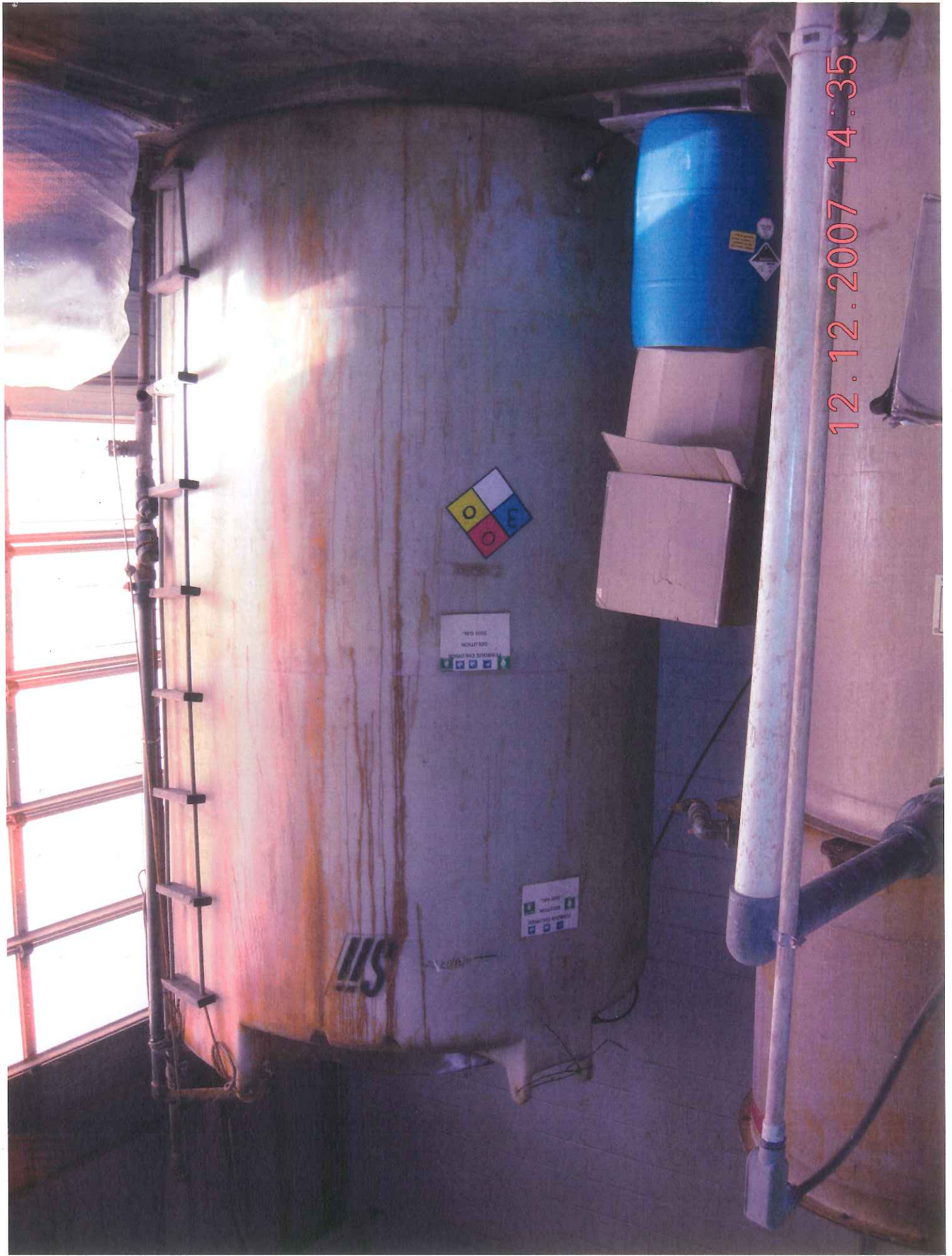
Eagle Electronics ILD 981 088 800

Photograph 18

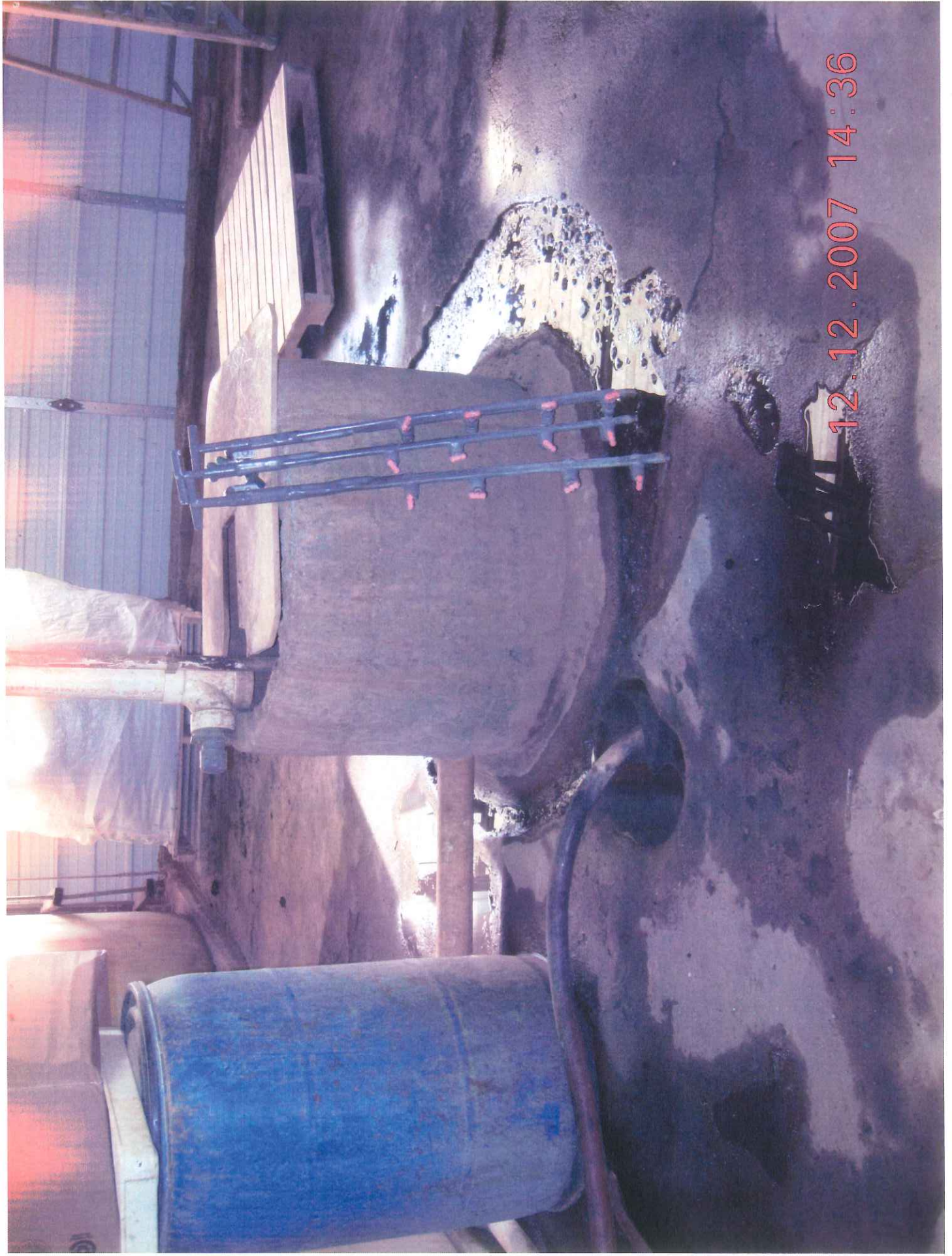


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Eagle Electronics IL0981088 800 Photograph 19

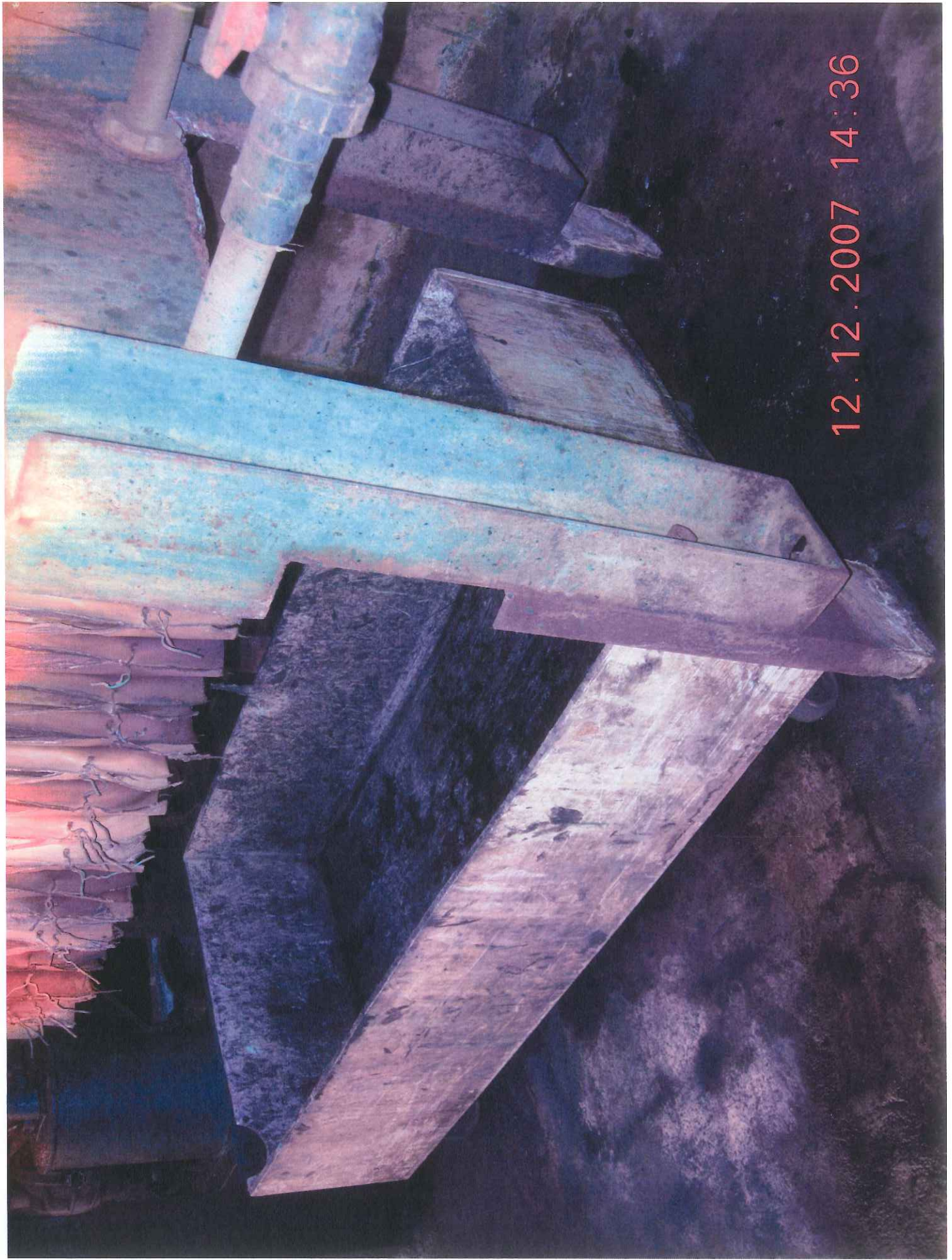


Eagle Electronics I.D 981088 800 Photograph 20



Eagle Electronics #D981088 800

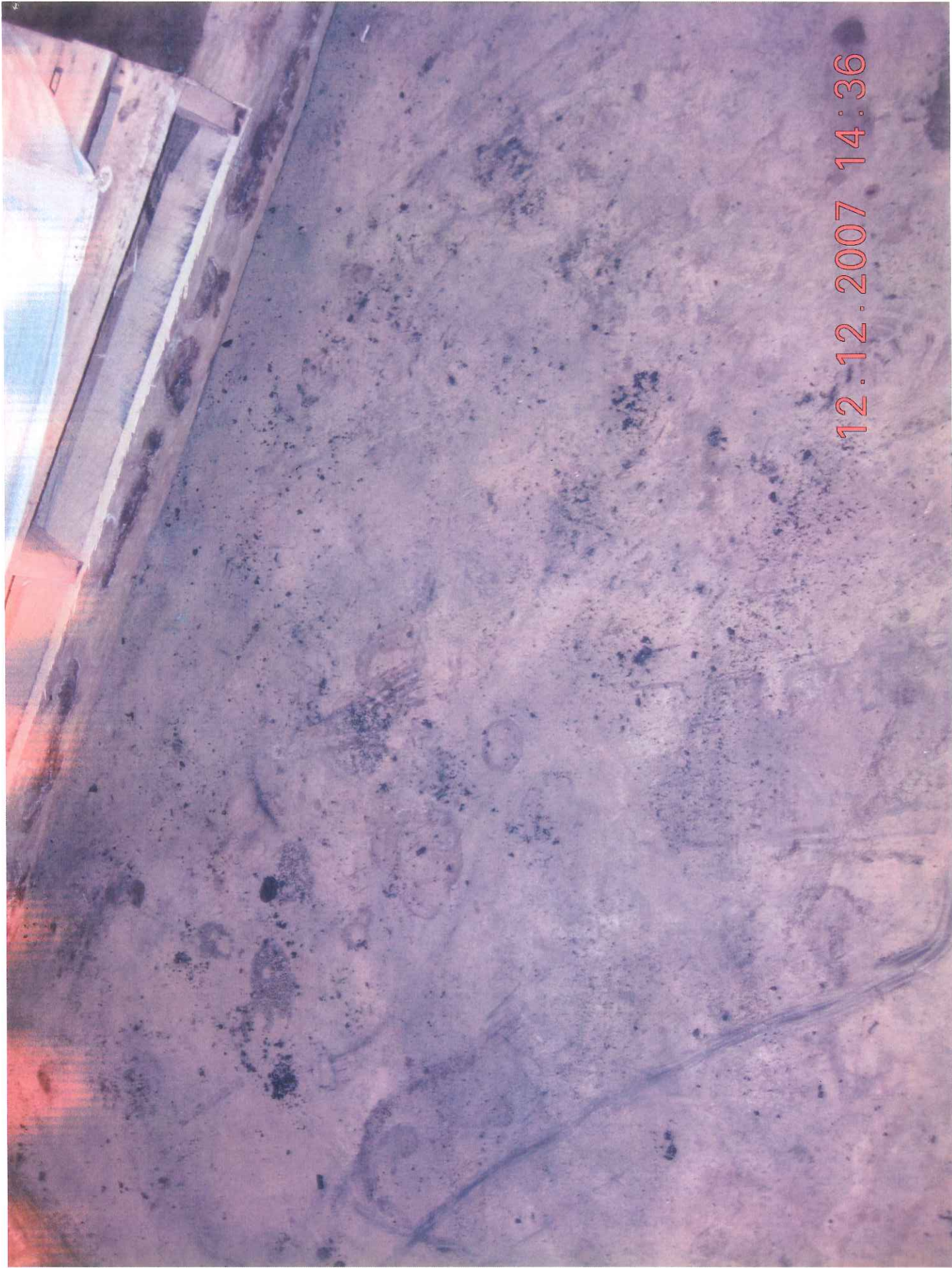
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Eagle Electronics ILD981088 500

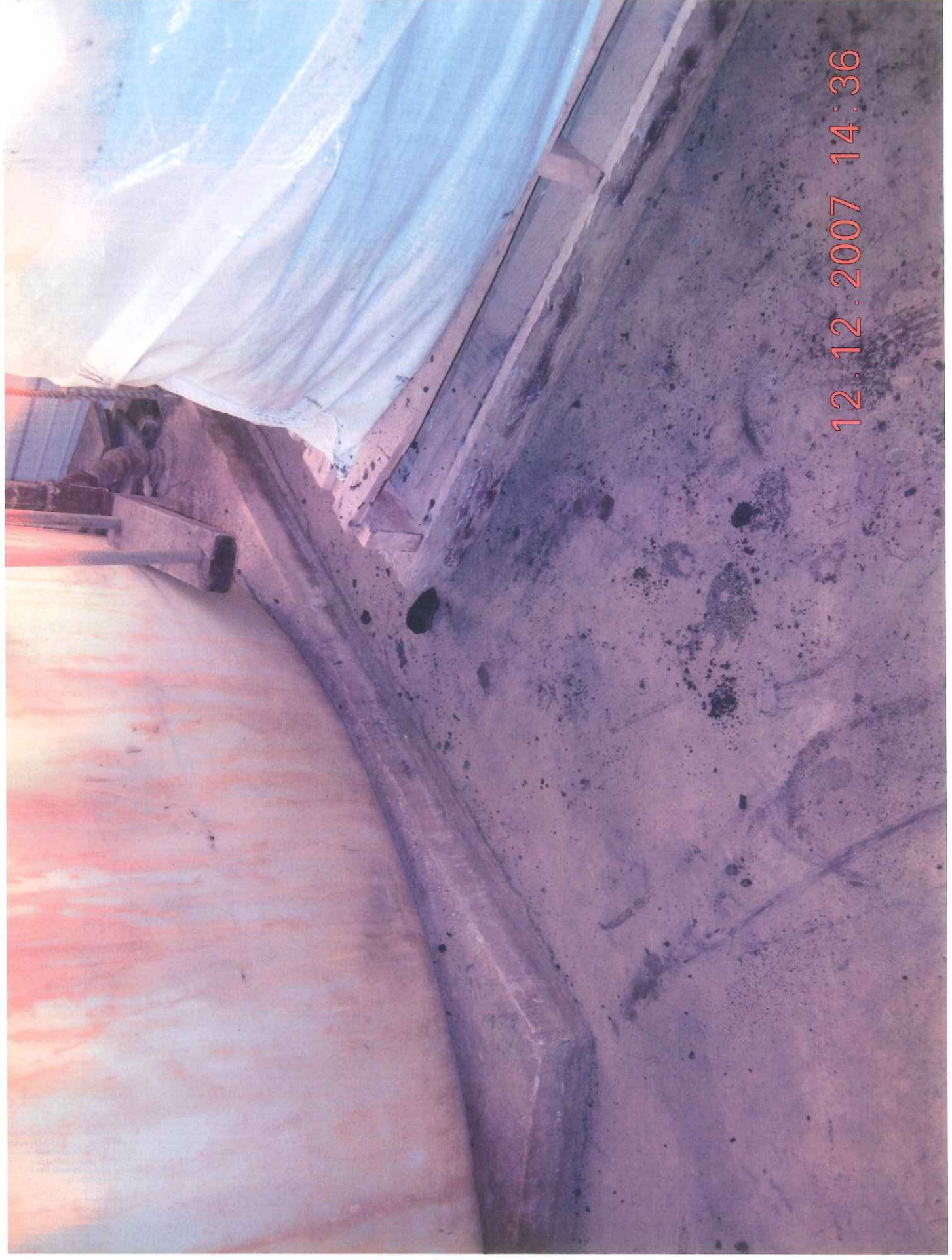
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12:12:2007 14:36

Eagle Electronics #LD 981 088 800

Photograph 23



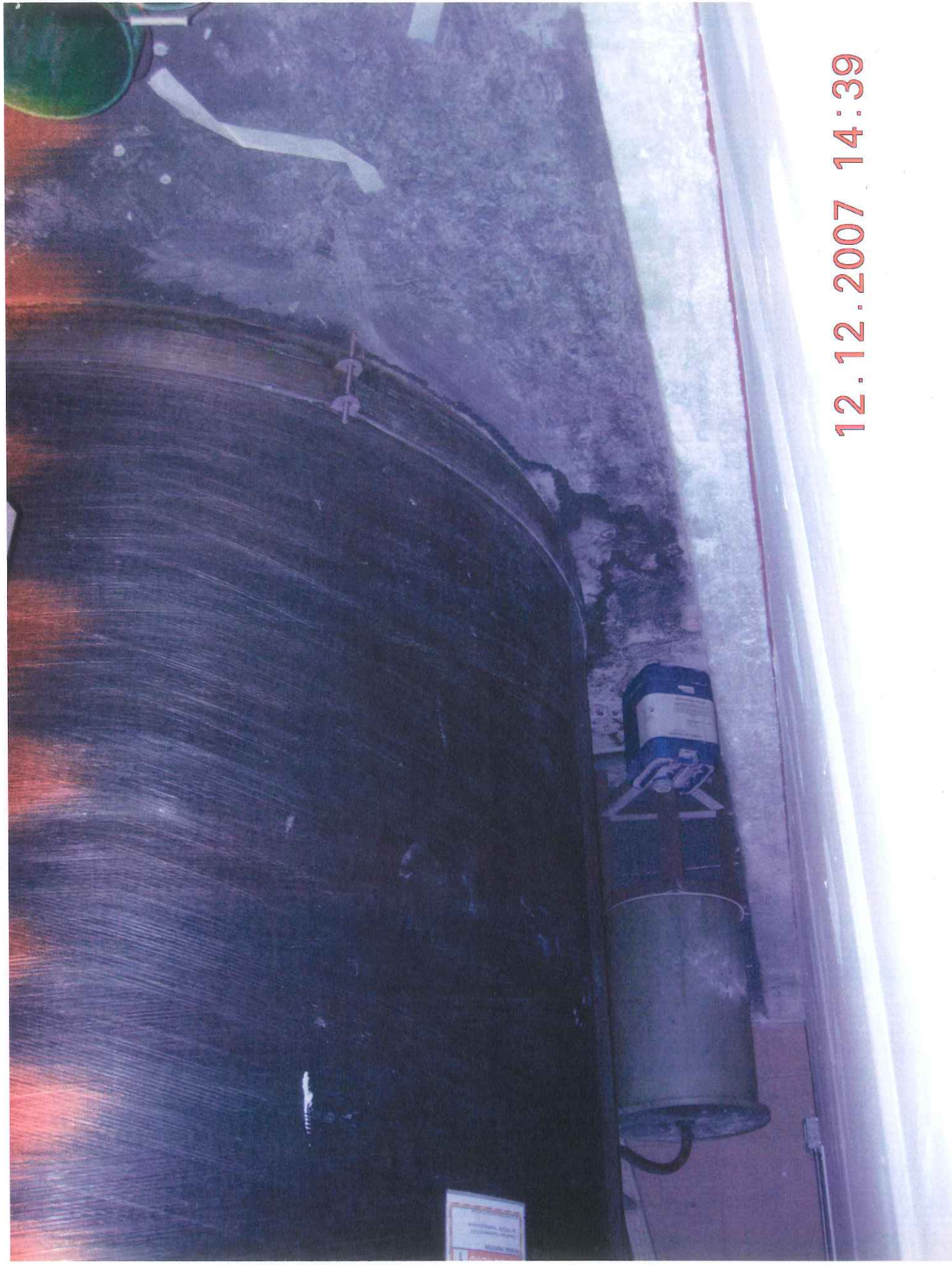
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Photograph 24

Eagle Electronics ILD981088 500



ILD 981 088 800 Eagle Electronics Photograph 25



12.12.2007 14:39

Eagle Electronics Inc 981 088 800

Photograph 26



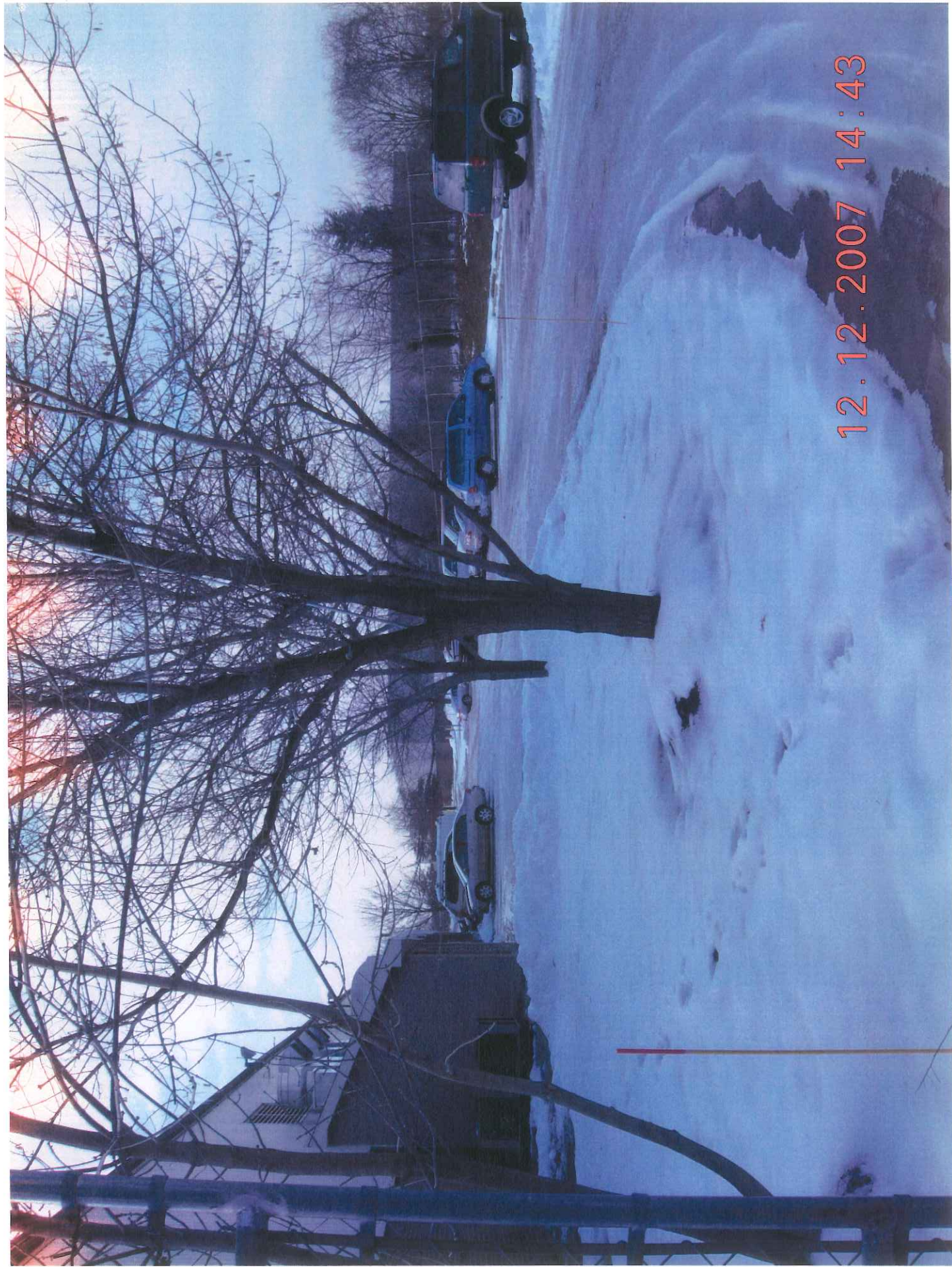
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Photograph 27



Photograph 28

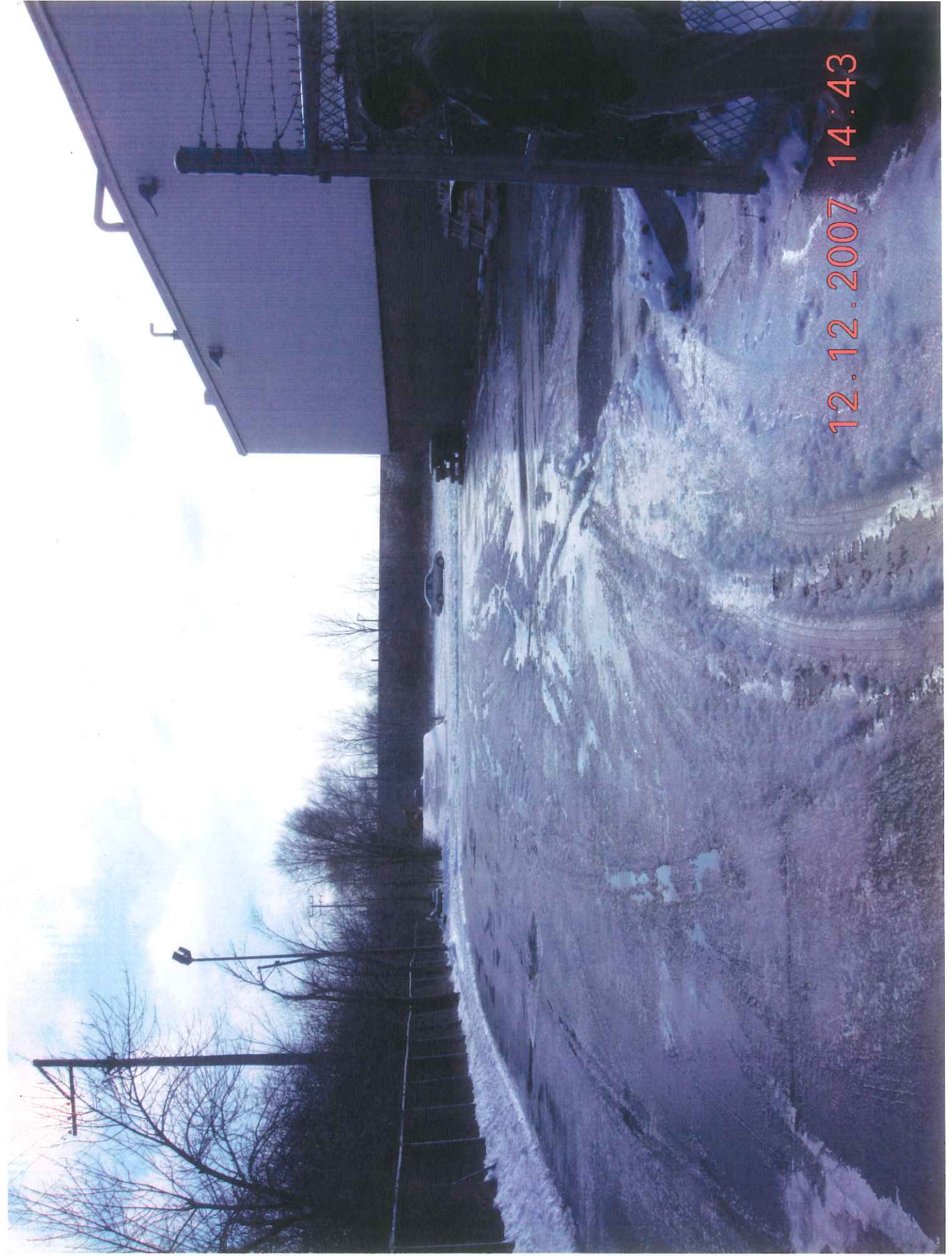
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Photograph 29

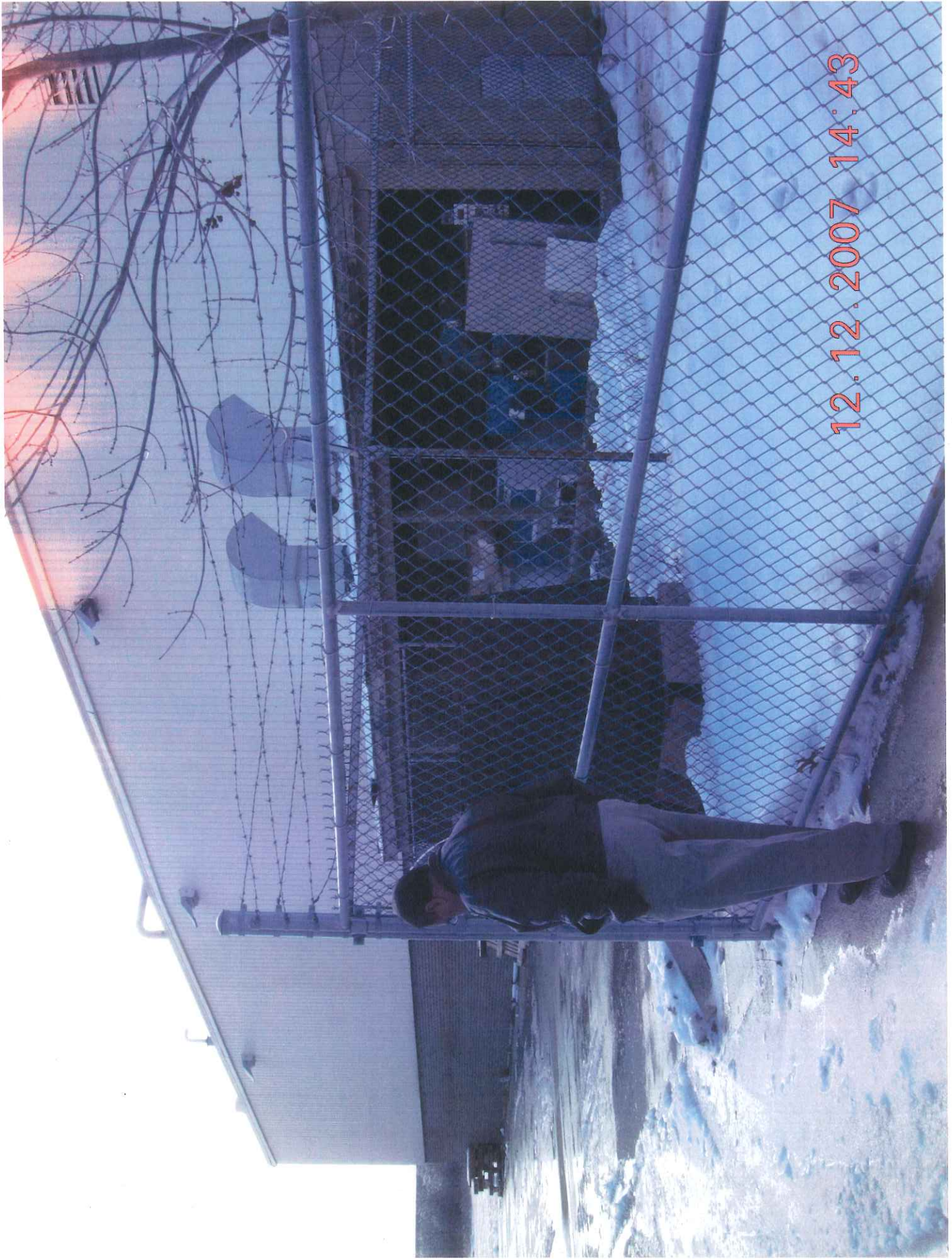
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Eagle Electronics IUD981058 800

Photograph 30



12.12.2007 14:43

Eagle Electronics ID981088800

Photograph 31



12.12.2007 15:41

Eagle Electronics ILD 981088 800

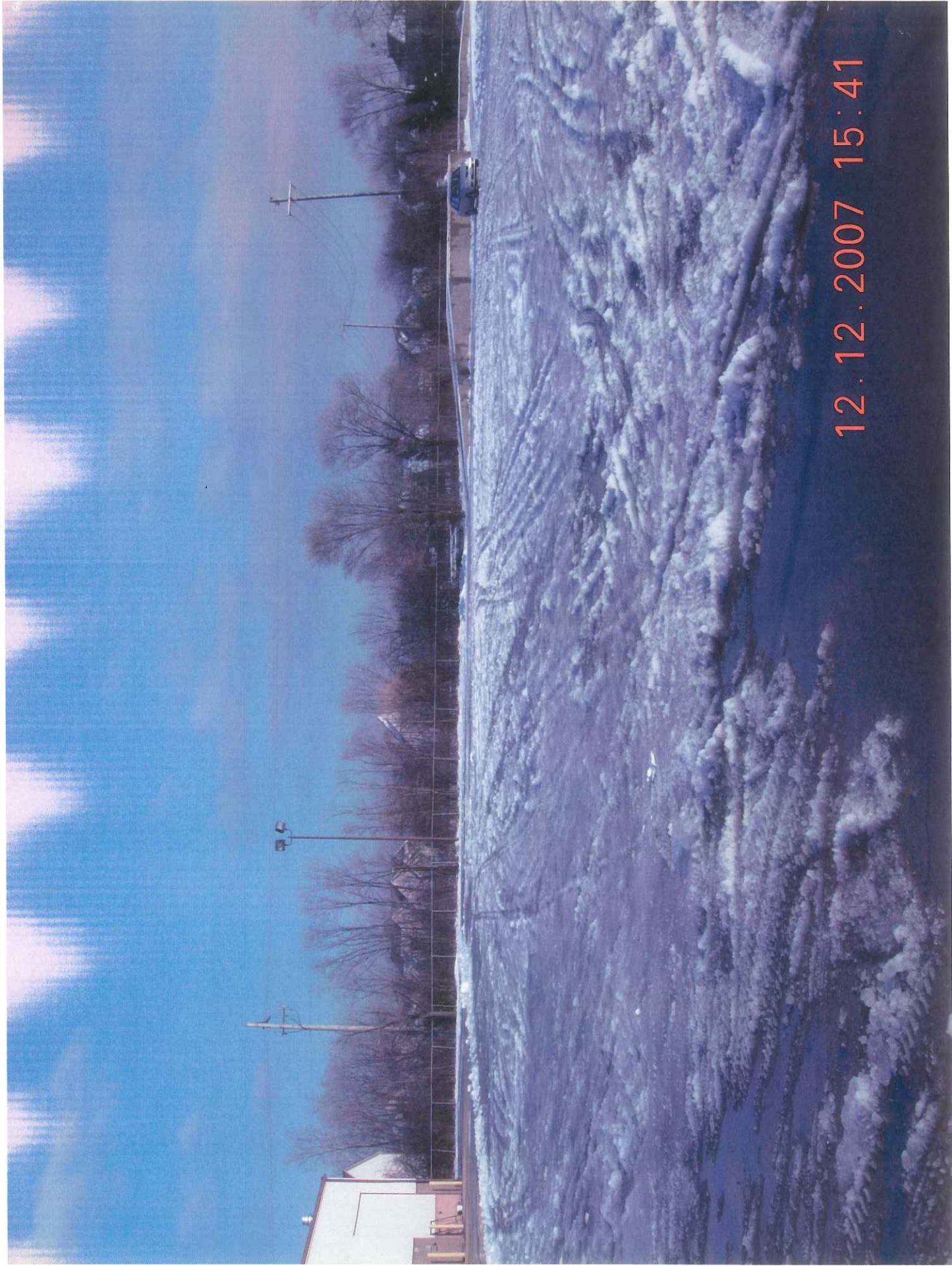
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12.12.2007 15:41

Eagle Electronics ID981088-800

Photograph 33



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Eagle Electronics ID981088 800

Photograph 34



12.12.2007 15:41

Eagle Electronics I.D. 981 088 8070

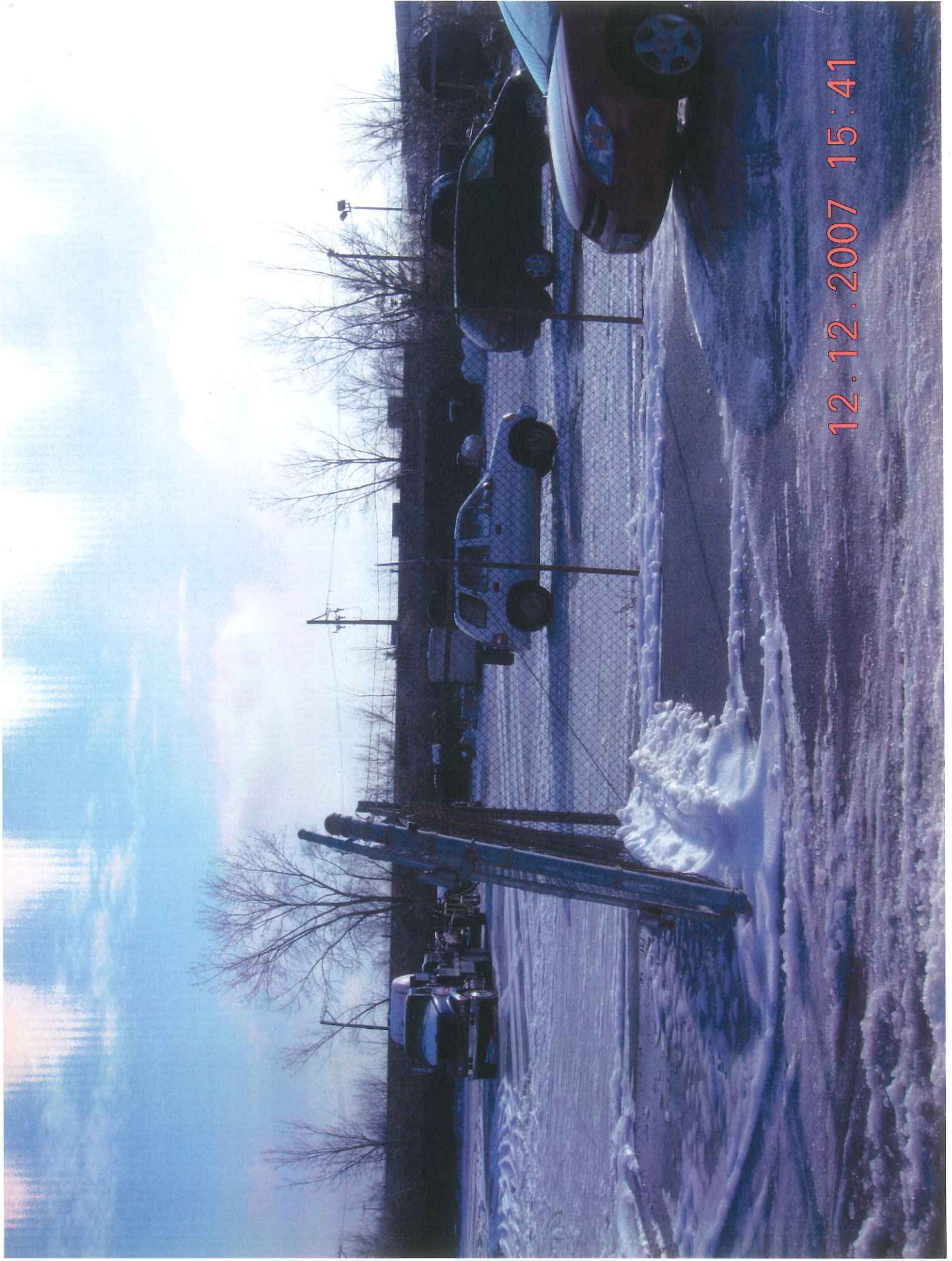
Photograph 35



12.12.2007 15:41

Eagle Electronics ID 981088 800

Photograph 36



12.12.2007 15:41

Eagle Electronics I D 981 088 800

Photograph 37



12.12.2007 15:41